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Department of Toxic Substances Control

Edwin F. Lowry, Director
700 Heinz Avenue, Bldg. F, Suite 200
Berkeley, California 94710-2737



Gray Davis
Governor

June 28, 2000

Mr. Robert Paggart, President
Trent Tube
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P.O. Box 77
East Troy, Wisconsin 53120-0077

TRANSMITTAL OF RCRA FACILITY ASSESSMENT FOR THE FORMER TRENT TUBE FACILITY, 2100 EAST ORANGETHORPE AVENUE, FULLERTON CALIFORNIA, EPA ID NO. CAD 008 325 110

Dear Mr. Paggart:

The Department of Toxic Substances Control (DTSC) has completed the enclosed RCRA Facility Assessment (RFA) for the above designated site. The purpose of the RFA is to identify releases or suspected releases from Solid Waste Management Units or Areas of Concern and to determine the need for further investigation and/or remedial action.

The preparation of this document, and all actions required by this document, are authorized by the Resource Conservation and Recovery Act (RCRA) Section 3008(h) as amended by the Hazardous and Solid Wastes Amendments (HSWA) in 1984, and the California Health and Safety Code, Section 25187. These laws provide DTSC the authority to require corrective action or other measures, as appropriate, when there is or has been a release of hazardous waste or constituents from a facility operating under "Interim Status". "Interim Status" means the authorization granted DTSC or the United States Environmental Protection Agency which allows a facility to continue operating pending review and decision of the facility's permit application. The Trent Tube facility in Fullerton applied for, and was granted, "Interim Status" on April 6, 1981 for storage and treatment of hazardous waste. Therefore, the facility is subject to corrective action.

This RFA concluded that remedial actions completed at this site during site closure were insufficient to determine whether potential for significant impacts to human health and the environment remain at the site. Specifically, groundwater in the area has been

Mr. Robert Paggart

June 28, 2000

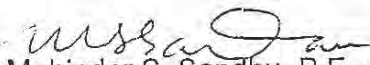
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contaminated with the same types of solvents as those used at the facility. Records show that these solvents were released to soils at the site and may have contributed to the groundwater contamination. Insufficient documentation exists to show that the soils were adequately remediated. Therefore, additional actions are recommended.

Please review and submit any comments you may have on the enclosed RFA by July 28, 2000. Please provide supporting documentation for comments which may add to or challenge the technical basis for the RFA. DTSC is prepared to draft an order pursuant to the California Health and Safety Code Section 25187 requiring specific corrective action activities be performed at the site. The order will specify time frames for completing the activities outlined in the enclosed RFA.

If you have any questions, please call Andrew Berna-Hicks of my staff at (510) 540-3956.

Sincerely,



Mohinder S. Sandhu, P.E., Chief

Standardized Permits and Corrective Action Branch

cc: John McCarrol
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Mr. Robert Paggart
June 28, 2000
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*Cal-EPA, Department of Toxic Substances Control
Hazardous Waste Management Program*

RCRA FACILITY ASSESSMENT DOCUMENT SIGN-OFF SHEET

Facility Name: *Former Trent Tube Facility
2100 East Orangethorpe Avenue
Fullerton, California
Orange County*

**RCRA FACILITY ASSESSMENT DOCUMENT FOR
THE FORMER TRENT TUBE FACILITY**

EPA I.D. NO.: *CAD 008 325 110*

RCRA X **Non-RCRA**

We certify, to the best of our knowledge, that we reviewed the RCRA Facility Assessment (RFA) for the former Trent Tube Facility. We further certify that: (1) the RFA conforms with the RCRA Corrective Action Guidance Manual, (2) the RFA is technically sound and (3) the RFA is administratively complete.

Project Manager: *Andy Berna-Hicks* *[Signature]* **Date:** *May 31, 2000*

Permit Staff: *Tony Natera* *[Signature]* **Date:** *6/12/2000*

Unit Chief: *Alfred Wong* *[Signature]* **Date:** *6/12/2000*

Branch Chief: *Mohinder Sandhu* *[Signature]* **Date:** *6/12/2000*

RCRA FACILITY ASSESSMENT

for

Trent Tube Division
Crucible Materials Corporation
2100 East Orangethorpe Avenue
Fullerton, California 92634
EPA I.D. #CAD008325110

Prepared by:

California Environmental Protection Agency
Department of Toxic Substances Control
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May 2000

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FIGURES

Figure 1 - Site Vicinity Map

Figure 2 - Site Map with SWMUs

Figure 3 - Sampling Well Locations

ATTACHMENTS

Attachment 1 - Visual Site Inspection

Attachment 2 - Photos

Attachment 3 - Environmental Priorities Initiative Preliminary Assessment, Trent Tube Division,
Ecology and Environment, September 15, 1991

Attachment 4 - Notification of Hazardous Waste Activity (Part A)

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

EXECUTIVE SUMMARY

In 1984, the United States Congress amended the Resource Conservation and Recovery Act (RCRA) by passing the Hazardous and Solid Waste Amendments (HSWA). HSWA provide authority to the United States Environmental Protection Agency (EPA) to require comprehensive corrective action for Solid Waste Management Units (SWMUs) and other areas of concern at facilities applying for a RCRA permit and those which have, or had, RCRA Interim Status. In July 1991, the California Department of Toxic Substances Control received authorization from USEPA to implement the RCRA program in the State of California.

The intent of HSWA and the California State law is to address previously unregulated releases of hazardous constituents to air, soil, surface water, groundwater, and the generation of subsurface gas. To achieve this objective, a RCRA Facility Assessment (RFA), which identified and assessed the SWMUs and other areas of concern, was performed at the former site of the Trent Tube facility, 2100 East Orangethorpe Avenue, Fullerton, Orange County, California.

The purpose of this RFA is to determine whether a release of hazardous waste or hazardous constituents has occurred from SWMUs or Areas of Concern (AOCs) and to determine the need for further action to be performed at the site.

This assessment is based only on information found in the files of the following agencies: U.S. EPA Region IX, Department of Toxic Substances Control-Cypress Regional Office and the Glendale Regional Office, Orange County Assessors Office, Orange County Water District. A Visual Site Inspection conducted on February 11, 1999, was also a source of information for this RFA.

The facility was constructed in the late 1950s by the Trent Tube Company, a Division of Crucible Materials Corporation. Trent Tube manufactured stainless steel tubing and customized prefabricated tubing made to customer specifications. On May 11, 1984, all manufacturing was terminated. The building is currently being used to store recreational vehicles. The building and property are now owned by LaBarron Investments.

A total of four SWMUs and one AOC were identified. They are:

- SWMU #1: Drum Storage Areas
- SWMU #2: Waste Oil Tank
- SWMU #3: Spent Pickle Liquor Tanks
- SWMU #4: Degreasing Pit
- AOC #1: Area from the rear (south side) of the plant building to the property boundary.

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Constituents of concern used at the facility include tetrachloroethane (PCE), trichloroethane (TCA), trichloroethylene (TCE), nitric acid, hydrofluoric acid, hexavalent chromium, nickel, lead, and waste oil

Closure of the facility was overseen by the Department of Health Services (DHS), now known as the Department of Toxic Substances Control (DTSC). Closure of the facility included removal of heavily impacted soils and aeration of lightly impacted soils contaminated with organic solvents including TCE, TCA, and xylene. Aerated soils were placed back into the excavated area. No confirmation sampling was conducted. No groundwater sampling was conducted as part of the closure. Closure was certified by an independent registered engineer and approved by DHS on April 16, 1985.

Orange County Water District sampling wells in the area of the former Trent Tube facility show significant PCE and TCE contamination. PCE and TCE were used and released at the former Trent Tube facility. (reference #7)

This RFA recommends:

- 1) concrete and soil sampling at the location of the Degreasing Pit (SWMU #4);
- 2) additional soil samples to be taken behind (south) the plant building (AOC#1);
- 3) concrete and soil samples to be taken in and around the Drum Storage Area (SWMU#1);
- 4) concrete and soil samples to be taken in and around the Spent Pickle Liquor Tanks (SWMU #3), and
- 5) a comprehensive groundwater sampling program to determine the extent and degree of groundwater contamination

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1 0 INTRODUCTION

In 1984, the United States Congress amended the Resource and Conservation and Recovery Act (RCRA) by passing the Hazardous Waste and Solid Waste Amendments (HSWA). As a result, Section 3008(h) of RCRA, as amended by HSWA, and the California Health and Safety Code, Section 25187 provided the United States Environmental Protection Agency (U.S. EPA) and the California Department of Toxic Substances Control (DTSC) the authority to require comprehensive corrective action on Solid Waste Management Units (SWMUs) and other Areas of Concern (AOCs) at facilities which have been issued an Interim Status Document (ISD) for the treatment, storage, or disposal of hazardous waste. These laws apply regardless of whether the ISD is in effect or has been terminated, or whether the facility is currently operating or has closed. The primary objective of the corrective action program is to clean up releases of hazardous waste or hazardous constituents that threaten or could potentially threaten human health or the environment.

To achieve this objective, a RCRA Facility Assessment (RFA) is conducted to identify and evaluate the SWMUs and AOCs. The purpose of a RFA is to determine whether a release of hazardous waste or hazardous constituents has occurred from SWMUs or AOCs and to determine the need for further investigation to be performed if necessary.

This assessment is based only on information found in the files of the U.S. EPA Region IX, Cal/EPA Department of Toxic Substances Control-Cypress and Glendale Regional Offices, Orange County Assessors Office, and a Visual Site Inspection conducted on February 11, 1999. A search of the Sanborn Insurance Maps at the University of California Berkeley Map Library did not produce any maps for the location occupied by this facility.

Trent Tube Division, Fullerton, CA
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2.0 FACILITY DESCRIPTION

2.1 Site Location, Property Ownership, and Responsible Parties

The 5.2 acre site is located at 2100 East Orangethorpe Avenue in Fullerton, Orange County, California, Latitude 33°51'30" N, Longitude 117°53'03" W. The property is currently owned by LaBarron Investments, 2020 East Orangethorpe, Fullerton 92831, President Eddie Fisher (714) 680-3812.

Trent Tube headquarters is located at 2015 Energy Drive, P.O. Box 77, East Troy, Wisconsin, 53120-0077, phone (800) 558-2260, web site: <http://www.trent-tube.com>. Trent Tube, at the time of operation, was owned by Colt Industries, Inc. It was sold to Crucible Materials Corporation in 1985 (reference #11).

2.2 Operations and Hazardous Waste Management

The manufacturing portion of the building measures approximately 300 feet by 130 feet giving a total square footage of 39,000. Operations at the facility involved the manufacture of stainless steel tubing. Details of the manufacturing process are not available. Operations at the facility generated hazardous waste consisting of waste oil, spent organic solvents, degreaser agent 1,1,1 trichloroethane (TCA), and waste pickle liquor. The waste oil was stored in ten 20-gallon steel containers. Spent solvents and degreasers were stored in 55-gallon drums in two hazardous waste storage areas with a total capacity of 20 drums. The waste pickle liquor was stored in two 2,000-gallon indoor tanks.

The manufacturing area of the plant included a degreasing tank containing 1,1,1 trichloroethane, process and acid treatment solution tanks containing pickle liquor, acid and solvent storage, kerosene storage, liquid hydrogen and liquid ammonia storage, lubricant storage, compressed nitrogen cylinder storage, and a laboratory.

To the rear, or south side of the plant, was a storage area for waste solvents (SWMU #1). Waste oil was stored in a 200 gallon waste oil tank outside the building in the southwest portion of the yard (SWMU #2). The degreasing tank (SWMU #4) and two waste pickle liquor tanks (SWMU #3) were inside the building. See Figure 2 for exact locations of these units.

2.3 Operational History

late 1950s The facility was constructed in the late 1950s by the Trent Tube Company.

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

August 1980	Notification of Hazardous Waste Activity form was filed with the US EPA (see attachment #4)
November 1980	RCRA Part A was submitted to EPA for treatment and storage of hazardous waste
April 6, 1981	The facility was issued an Interim Status Document (ISD) by the Department of Health Services (DHS, now known as DTSC) authorizing the treatment and storage of hazardous wastes.
July 22, 1983	In a letter from Trent Tube to DHS dated July 22, 1983, Trent Tube stated that the spent pickle liquor contains "chromium (6+) generally less than 500 mg/l; and nickel, generally 1300-1800 mg/l" (reference #5)
August 26, 1983	Trent Tube submits Part B Permit Application to DHS. A Closure Plan was included as part of the application.
April 1, 1984	Revised Closure Plan submitted by Trent Tube.
May 4, 1984	Memo from RWQCB, Santa Ana Region, to DHS, concerning an inspection by the RWQCB which found small areas of soil contaminated with waste oil on the south side of the plant (reference #2)
May 11, 1984	Trent Tube ceased all manufacturing at the site. Immediately thereafter, the facility began implementation of the Closure Plan. Closure included removing all drums of wastes and virgin chemicals; washing and rinsing of the degreaser tank; neutralization and disposal of pickle liquor to a Class I landfill; dismantling and removal of the pickling tanks and exhaust ducts; removal of ammonia and associated storage tanks by suppliers; removal and disposal of contaminated soil behind the building as requested by the Regional Water Quality Control Board (reference #3). Two small areas of soil stained by waste oil were excavated to a depth of three feet and the excavations were filled with clean crushed stone (reference #4). There are no references in the record to soil sampling during these activities. Reports on this initial excavation work were not found during the file review process.
December 3, 1984	Letter sent to Trent Tube from DHS advised that the Closure Plan was inadequate and that a written Site Assessment Plan should be submitted.

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- December 18, 1984 Site Assessment Plan was prepared by Calocerinos & Spina and submitted to DHS (reference #4). This plan described details for collecting soil samples in the area behind (south) of the plant, and the analysis of these samples for organic solvent contamination.
- December 26, 1984 Site assessment work began. Soil samples were taken at three depths at three different locations. The analysis was targeted for 1,1,1 trichloroethane and methylene chloride (SW-846 Method 601) and benzene, toluene, and xylene (SW-846 Method 602).
- January 18, 1985 The results of the Site Assessment were submitted. Fourteen borings were completed to the rear (south side) of the facility and three additional borings were completed at "clean" background locations. Sampling was completed to a maximum depth of 10 feet. A portable QVM (organic vapor meter) was also employed to pinpoint areas of contamination. Sample analysis showed soil contaminated with organics (TCA, TCE, and Xylene) to a depth of five feet. This document also proposed a Site Remediation Plan which included remediation measures consisting of excavation and disposal of heavily impacted soils (5 ppm to 780 ppm organic solvent), and excavation, aeration, and replacement of lightly impacted soils (up to 5 ppm organic solvent). The Site Remediation Plan indicate that the proposed remediation measures were the "minimum necessary" and that the proximity of structures would limit the extent of soil excavation. The Site Remediation Plan was approved by DHS and the South Coast Air Quality Management District (SCAQMD).
- February 1, 1985 Trent Tube submits an amendment to an application to the SCAQMD to excavate and aerate solvent contaminated soils.
- February 11, 1985 Excavation activities commenced as detailed in the Site Remediation Plan. Four truckloads (57 cubic yards) of contaminated soil from the rear of the building (south side) were excavated and transported to the Casmalia Resource Landfill.
- February 25, 1985 Sixteen additional truckloads of soil were excavated from the rear of the building (south side) between the Trent Tube fence and large drainage channel behind the site. The soil, containing up to 5 ppm organic solvent, was spread in a thin layer for aeration in the area to the east of the building.

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- March 1, 1985 The aerated soil was placed back into the excavated area. The aerated soil comprises the top 2 feet of the area excavated. Approximately 40 cubic yards of soil from a hot-spot (tested at 780 ppm TCA) was removed and hauled to a Class I disposal site. No record of post-excavation confirmation sampling was found.
- April 16, 1985 DHS sends a letter to Trent Tube (reference #10) stating that facility closure is approved based on the Professional Engineer's Certification of Closure submitted by Calocerinos & Spina, March 11, 1985 (reference #2). This letter states that "this acknowledgment of facility closure is not certification that your facility does not pose any environmental or public health threat nor does it remove any liability associated with past hazardous waste management practices at the site "

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3.0 ENVIRONMENTAL SETTING

3.1 Site Location and Features

Trent tube is located in a light industrial/commercial area. There are no residences bordering the property. The manufacturing building measures approximately 300 feet long and 130 feet wide. The building is concrete block with a concrete floor. Areas outside the building are paved with asphalt.

To the north of the site is East Orangethorpe Avenue, to the east is a rental storage space facility, to the south is a drainage culvert, and to the west is Lewellyn Avenue.

Based on information received from the California Department of Fish and Game's Natural Diversity Data Base, no endangered or threatened plants or animals are known to exist within one half mile of the facility. (reference #9)

3.2 Surface Water

A drainage culvert, known as Carbon Creek, runs east-west to the south of the property. Carbon Creek flows into the San Gabriel River. Neither Carbon Creek nor San Gabriel River is used as a drinking water source for Orange County Water District. (reference #1)

3.3 Site Hydrology

The site is located in the coastal plain and is underlain by three major aquifer systems: the lower, middle and upper aquifers. The upper aquifer system consists of sediments and upper Pleistocene and younger alluvium to a thickness of 800 feet and is formed by sediments of the La Habra Formation, stream terrace deposits, older alluvium, and recent alluvium. The middle aquifer system is comprised of lower Pleistocene sediments from the San Pedro and Coyote Hills formations. The middle aquifer system is the major groundwater supply for the Orange County basin and contains multiple layers of gravelly sediments. The lower aquifer is comprised of Pleistocene and older sediments, bearing fresh water to a depth of almost 4,000 feet. Interconnection of the upper and middle water-bearing strata is through recent alluvium, limited by the Norwald fault zone. (reference #1)

Soils in the region consist of alluvial sand and silty sand. Groundwater beneath the site is found at approximately 80 feet below ground surface. Groundwater flow is to the southwest. Annual net precipitation in the Fullerton area is 5.19 inches (reference #1).

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The City of Fullerton and the surrounding cities of Anaheim and Orange use groundwater in the area as a source for a portion of their drinking water. The aquifer beneath the site is part of the groundwater system used for this drinking water. The Orange County Water District manages wells in the area.

3.4 Human Health and Environmental Risk

3.4.1 Human Health Risk

Residential population estimates for the Trent Tube area, based on 1990 Census Data, are the following:

1 mile radius: 18,090

2 mile radius: 87,350

Potential for significant air releases from the existing site are low based on: (1) levels of VOCs found in soils around the plant during closure operations; (2) the facility has been closed since 1985 and therefore most volatiles in surface soils have evaporated; (3) the site is now paved; and (4) no hazardous materials are currently stored at the site.

Surface water drainage around the site empties to the storm sewer which drains to Carbon Creek, a concrete paved culvert which drains to the San Gabriel River. The San Gabriel River is not a regulated drinking water source. Swimming, bathing, fish ingestion, or nonregulated drinking by humans may have posed a risk to human health if a spill occurred when the facility was operating. There is currently no potential of risk to human health from the facility since the facility has been closed for years.

Groundwater in the area is used for drinking. Groundwater wells are monitored by the Orange County Water District. Groundwater analyses performed by the Orange County Water District (reference #7) have shown contaminated groundwater in wells downgradient (southwest), upgradient (north and northeast), and northwest of the site (See figure 3).

- Downgradient well identified as FM-3 tests positive for PCE. However the PCE contamination has been decreasing in recent years (8.7 ppb in 1995 to 2.5 ppb in 1999). Trace amounts of TCE were detected in this well in 1995 and 1996. No TCE has been detected in this well since 1997.
- Upgradient well FFS-1 tests positive for PCE (12.4 ppb in 1998).
- Upgradient well F-KIM2 tests positive for PCE (3.2 ppb in 1999).

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- To the northwest, well FM-5 tests positive for TCE (170 ppb in 1995 and 104 ppb in 1999). This well also shows increasing levels of PCE (3.1 ppb in 1995 and 16.2 ppb in 1999) as well as DCE (10.2 ppb in 1997) and traces of DCA (DCA and DCE are breakdown products of PCA and TCE, respectively).

The Maximum Contaminant Levels (MCLs) for both PCE and TCE in drinking water is currently 5 ppb. The water districts cleanup goal is zero, or non-detect, for these constituents.

These groundwater results suggest that Trent Tube may have, and may still be, contributing to groundwater contamination in the area due to the fact that two contaminants found in the groundwater, PCE and TCE, were used at Trent Tube and were found in contaminated soils at the site. The detection of PCE and TCE in wells upgradient of Trent Tube suggests the possibility of other sources for the contamination in the groundwater, however, until a more complete groundwater evaluation of the area is completed, including seasonal variations in groundwater flow direction, it is difficult to determine the source or sources of groundwater contamination in the area.

Groundwater extracted from wells in the vicinity of the former Trent Tube facility poses a potential health risk to those consuming or in contact with it (reference #8).

3.4.2 Environmental Risk

The principle environmental risk is due to contaminants left at the site from past spills and leaks.

Groundwater is an environmental resource which needs to be protected. In this case, groundwater is a primary source of drinking water for the area. Soils contaminated with volatile organic compounds (VOCs) at the site, if present, have a high potential for impacting groundwater.

Surface water from the facility drains to Carbon Creek which runs along the south boundary of the facility. This culvert empties into the San Gabriel River. There is currently no potential for contamination to surface water from the Trent Tube site since (1) the facility has been closed since 1985; (2) the site is paved; and (3) no hazardous materials are currently stored at the site.

No federal or State protected species of animals or plants are known to exist in the vicinity of the Trent Tube site (reference #9).

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4.0 DESCRIPTION OF SWMUs and AOCs.

The following areas have been designated Solid Waste Management Units (SWMUs) at the facility:

SWMU #1: DRUM STORAGE AREAS - Two drum storage areas were located outside, to the south of the Trent Tube building. (see figure #2)

Total Capacity: 20 55-gallon drums (1100 gallons)

Dates of Operation: late 1950s to May 11, 1984.

Waste Managed: Solvents, degreasers including TCA, and kerosene. Analyses of contaminated soils in the area indicate the presence of tetrachloroethylene (PCE) and trichloroethylene (TCE) (reference #6). Therefore, it is very likely that these chemicals were stored in the storage areas.

Containment: The storage areas originally were concrete bermed impoundments. The impoundments were removed. The areas are currently paved with asphalt.

History of Releases: Soil sampling within 5 feet of this SWMU revealed soils contaminated with TCA (1.5 ppm), PCE (1.7 ppm), ethylbenzene (1.7 ppm), and xylene (2.7 ppm). No sampling was performed directly under these areas (reference #6).

Potential for Impacts to the Environment: Due to the high mobility of solvents in soil, residual soil contamination may have, and may still be, impacting groundwater. The Site Assessment Report of January 18, 1985 found organic solvents at levels stated in the previous paragraph. Groundwater in the area has been found to contain TCE and PCE solvent contamination. Surface water is not expected to be impacted because the site is currently paved and no hazardous materials are currently stored at the site. This SWMU is associated with, and bordering on AOC #1.

SWMU #2: WASTE OIL TANKS - Waste oil was stored in two 200 gallon steel unlined waste oil tanks outside the building next to the south facing wall (reference #1). The oblong tanks measured 31" wide by 36" wide by 45" deep. No piping or valves were associated with these tanks. The tanks were surrounded by a cement

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brick and concrete wall with a capacity of 3700 gallons.

Capacity: 200 gallons

Dates of Operation: late 1950s to May 11, 1984.

Waste Managed: The waste oil tanks held waste lubricant oil. Additional contaminants contained in the oil are unknown, however, it is assumed that the oil would contain metals from the machining processes. Contaminants would therefore include chrome and nickel. If waste oil from vehicles was added to this tank, lead may also have been present.

History of Release: Two loci of contamination were located within the area of the waste oil tanks. Soil from these areas was removed on May 11, 1984 (see Section 2.4 Operation History).

Containment: The steel tanks were originally located in a concrete impoundment. The impoundment was removed. The area is currently paved with asphalt.

Potential for Impacts to the Environment: Residual waste oil may remain in the area around this SWMU. However, oil and associated metal contaminants, do not tend to migrate quickly. Impacts are expected only in soils in the immediate area of this SWMU and are not expected to have impacted groundwater or surface water.

SWMU #3: SPENT PICKLE LIQUOR TANKS - Two 2,000-gallon aboveground tanks were located inside the southeast portion of the Trent tube building. Spent pickle liquor was neutralized inside these tanks.

Capacity: Two 2,000-gallon tanks (4000 gallons total)

Dates of Operation: 1950s to May 11, 1984

Wastes Managed: Nitric and hydrofluoric acid were used for descaling and cleaning stainless steel tubing. The spent mixture was neutralized with ammonia inside these tanks prior to off-site disposal. The mixture contained chromium (+6), nickel, and possibly lead. Approximately 7,000 to 10,000 gallons of this waste were generated per year.

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Release Controls: The tanks were located inside the building which had a concrete floor.

History of Releases: There is no known history of release. No record of soil sampling and analysis for metals was found.

Potential for Releases to the Environment: Potential exists for impacts to the surrounding soils from hydrofluoric acid, hexavalent chromium, nickel, and lead. Since this area is indoors and covered with concrete, and these contaminants are known not to migrate through soils rapidly, impacts to groundwater are not expected. Impacts to soils, if present, are expected to be in the immediate area.

SWMU #4: DEGREASING PIT - A degreasing pit measuring 13 feet by 16 feet by 7 feet deep was located inside the Trent Tube building. This pit was observed by consultants from Ecology and Environment in 1983. No other information is available. (reference #1)

Capacity: approximately 10,000 gallons

Wastes managed: Based on information on other units at the facility, wastes managed at the pit may have included TCE, TCA, and PCE.

History of Releases: There are no records of releases or any records of sampling in or near this SWMU. Groundwater in the area is known to contain TCE and PCE.

Potential for Impacts to the Environment: Solvents used in this SWMU are highly mobile and have the potential for impacting groundwater under the site. This area is indoors and covered in concrete which retards evaporation of solvents.

AOC #1: Rear (south side) of Plant Building - Soil in this area (measuring approximately 50 ft by 200 ft) was contaminated with VOCs and remediation work associated with closure may have been inadequate. Remediation included both excavation of soils for disposal at a landfill, and excavation of soils for aeration and placement back into the excavated area. Soils excavated for disposal had concentrations of up to 780 ppm TCA, 70 ppm PCE, and 70 ppm TCE. Soils with levels of up to 5 ppm organic solvents were aerated and then were placed back into the excavated areas as the top two feet of topsoil. No confirmation sampling was completed.

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after remediation of this area. This AOC is associated with, and borders on, SWMU #1.

Potential for Impacts to the Environment: Solvents found in soils at this AOC are highly mobile and have the potential for impacting groundwater under the site. Due to the lack of confirmation sampling, soils at the site may be currently contributing to the ground contamination. Impacts to surface water are not expected because the area is paved.

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5.0 CONCLUSIONS AND RECOMMENDATIONS

This report concludes that, as a result of past operations at the former Trent tube facility, a high potential for significant impacts to human health and the environment currently exists at this site. Factors which led to this conclusion include the following:

- 1) Remediation activities at the site did not include confirmation sampling of soils to ensure that aerated soils placed back into the excavated area at the rear of the building had been thoroughly remediated. These soils contained up to 5 ppm TCE and PCE.

Groundwater in the area is used as a drinking water source and is impacted with PCE and TCE. These VOCs were employed at the site.

Preliminary Remediation Goals from the USEPA for contaminated soils with the potential for contaminant migration to groundwater are the following :

TCE - 3 ppb

PCE - 3 ppb

Therefore, the potential levels in soils are 1666 times the screening levels for soils with the potential for releases to groundwater

- 2) No sampling was completed for SWMUs in the interior of the building;
- 3) No sampling was completed for the Waste Oil Tanks (SWMU #2); and
- 4) No toxic metal sampling was completed at any location at the site

Constituents of concern identified at the facility include tetrachloroethane (PCE), trichloroethane (TCA), trichloroethylene (TCE), nitric acid, hydrofluoric acid, hexavalent chromium, nickel, lead, and waste oil. Specific recommendations to characterize soils and groundwater at the site are the following:

Drum Storage Areas (SWMU #1) and Area to the Rear of Facility (AOC #1): Since no confirmation sampling was performed after remediation of contaminated areas to the rear of the facility, it is recommended that a comprehensive soil-vapor sampling plan be developed and implemented in these areas. In addition, it is recommended that soils be sampled and analyzed for nickel, chrome, and lead. Soil must be characterized to a sufficient depth (from the surface to

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

at least 10 feet below ground surface) to locate contaminated soils which may now be covered by clean fill or soils.

Waste Oil Tanks (SWMU #2): Shallow soil samples are recommended around this unit to detect possible impacts to soils. Analysis should include TPH, nickel, chrome, and lead.

Spent Pickle Liquor Tanks (SWMU #3): Concrete and shallow soil samples are recommended in and around the area of this SWMU with analysis for fluoride ion, pH, hexavalent chromium, nickel, and lead.

Degreasing Pit (SWMU #4): Concrete samples and both shallow (one foot) and deep soil samples are recommended in and around the area of this SWMU, with analysis for PCE, TCE, TCA, fluoride ion, pH, hexavalent chromium, nickel, and lead.

Groundwater: As stated in Section 3.4.1, the Orange County Water District has determined that groundwater in the area is impacted with PCE and TCE. In addition, the site is listed with the Regional Water Quality Control Board, Santa Ana Region on their "Spills, Leaks, Investigation and Cleanup (SLIC)" list (reference #12). The solvents in the groundwater were used at the Trent Tube facility and found in soils to the rear of the facility. Whether Trent Tube contributed to the groundwater contamination, and whether contaminated soil residues are still contributing to the groundwater problem, can not be ascertained at this time due to the small number of sampling wells in the vicinity. If soil-vapor tests and/or soil analysis as recommended above indicate the presence of VOCs in facility soils, it is strongly recommended that a comprehensive groundwater investigation be completed to determine the extent and sources of groundwater solvent contamination in the area.

Agency Coordination:

All activities must be coordinated with all government agencies involved including:

- (1) Department of Toxic Substances Control;
- (2) Regional Water Quality Control Board, Santa Ana Region; and
- (3) Orange County Water District.

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

6.0 REFERENCES

- 1 Environmental Priorities Initiative Preliminary Assessment, Trent Tube Division, Fullerton Operation, 2100 East Orangethorpe Avenue, Fullerton, CA, Ecology and Environment, Inc., September 15, 1991. Files: USEPA Region 9
- 2 Facilities Closure Report, Trent Tube Division, Fullerton Plant, Colt Industries, Inc., 2100 E Orangethorpe Avenue, Fullerton, CA, Calocerinos & Spina Consulting Engineers, March 11, 1985. Files: DTSC Cypress
- 3 Memorandum to Angelo Bellomo, Regional Administrator, Toxic Substances Control Division, Department of Health Services, Los Angeles, CA, from Regional Water Quality Control Board, Santa Ana Region, "Trent Tube Division (CAD 008325110) Closure Plan", May 4, 1984. Files: DTSC Cypress (copy contained within reference #2)
- 4 Site Assessment Plan, Trent Tube Plant, Fullerton, CA, Calocerinos & Spina Consulting Engineers, December 18, 1984. Files: DTSC Cypress
- 5 Letter from Trent Tube to DHS, Subject: Treatment Facilities, July 22, 1983. Files: DTSC Cypress.
- 6 Site Remediation Plan, Trent Tube Plant, Fullerton, CA, Calocerinos & Spina Consulting Engineers, January 18, 1985. Files: DTSC Cypress
- 7 Information Request Transmittal, Former Trent Tube. Prepared by Orange County Water District, 10500 Ellis Avenue, Fountain Valley, California, June 28, 1999, Request Number 3518, Search Years 1995-present
- 8 Telephone conversation between Nira Yamachika, Orange County Water District, Santa Ana, California and Andrew Berna-Hicks, DTSC, July 1999
- 9 State of California Department of Fish and Game, "Natural Diversity Database (Rarefind)," Anaheim Quadrangle, 9/7/99
- 10 Certification of Closure, Trent Tube Fullerton Facility, Department of Health Services, Los Angeles Office, April 16, 1985. Files: DTSC Cypress
- 11 Telephone conversation between Harvey Simmons, General Council, Crucible Materials Corporation, Syracuse, New York and Andrew Berna-Hicks, DTSC, October 6, 1999.
- 12 Maneck Chichgor, Regional Water Quality Control Board, Santa Ana Region

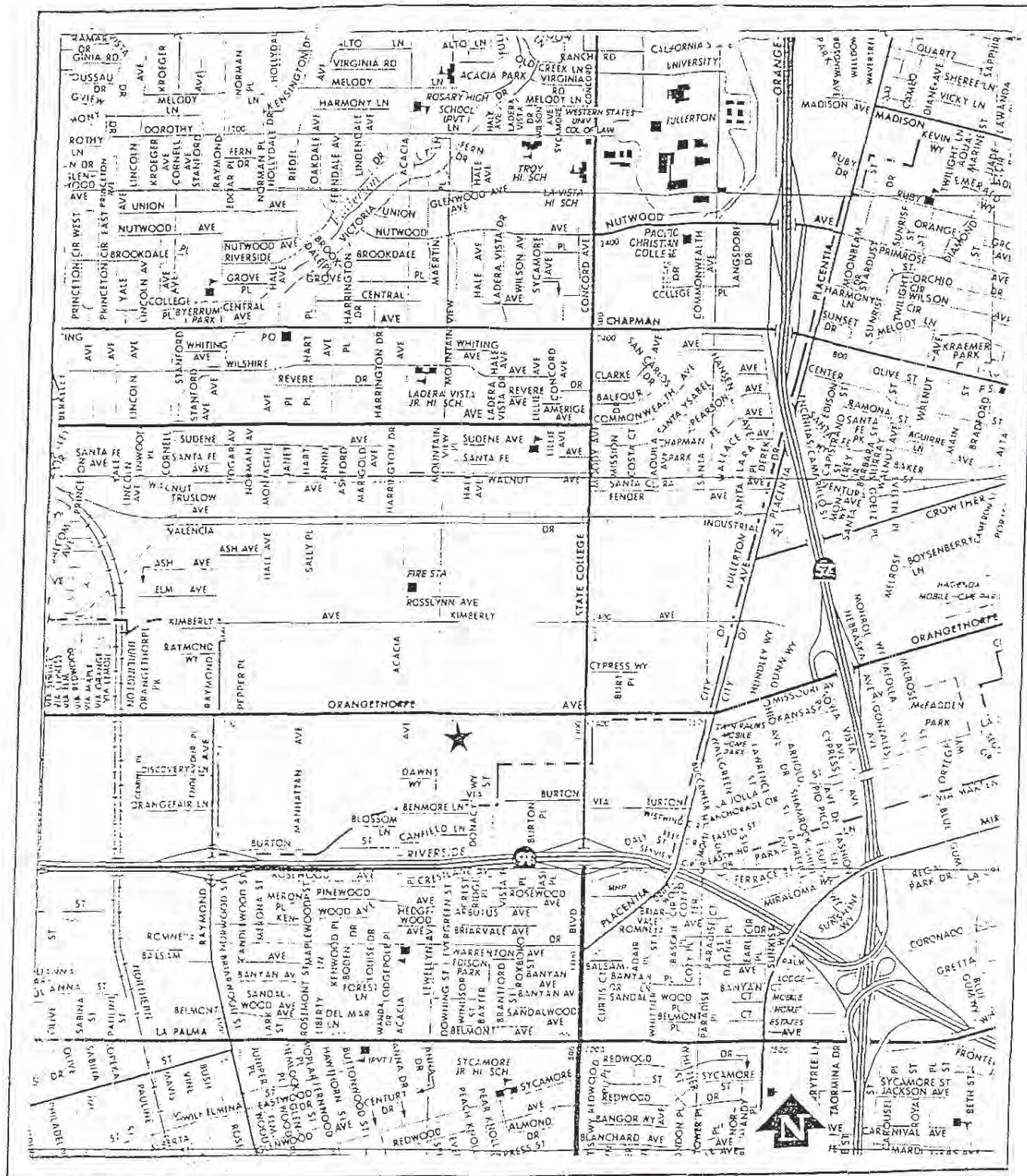


Figure 1
 --SITE LOCATION--
TRENT TUBE DIVISION
 2100 East Orangethorpe Avenue
 Fullerton, CA 92634

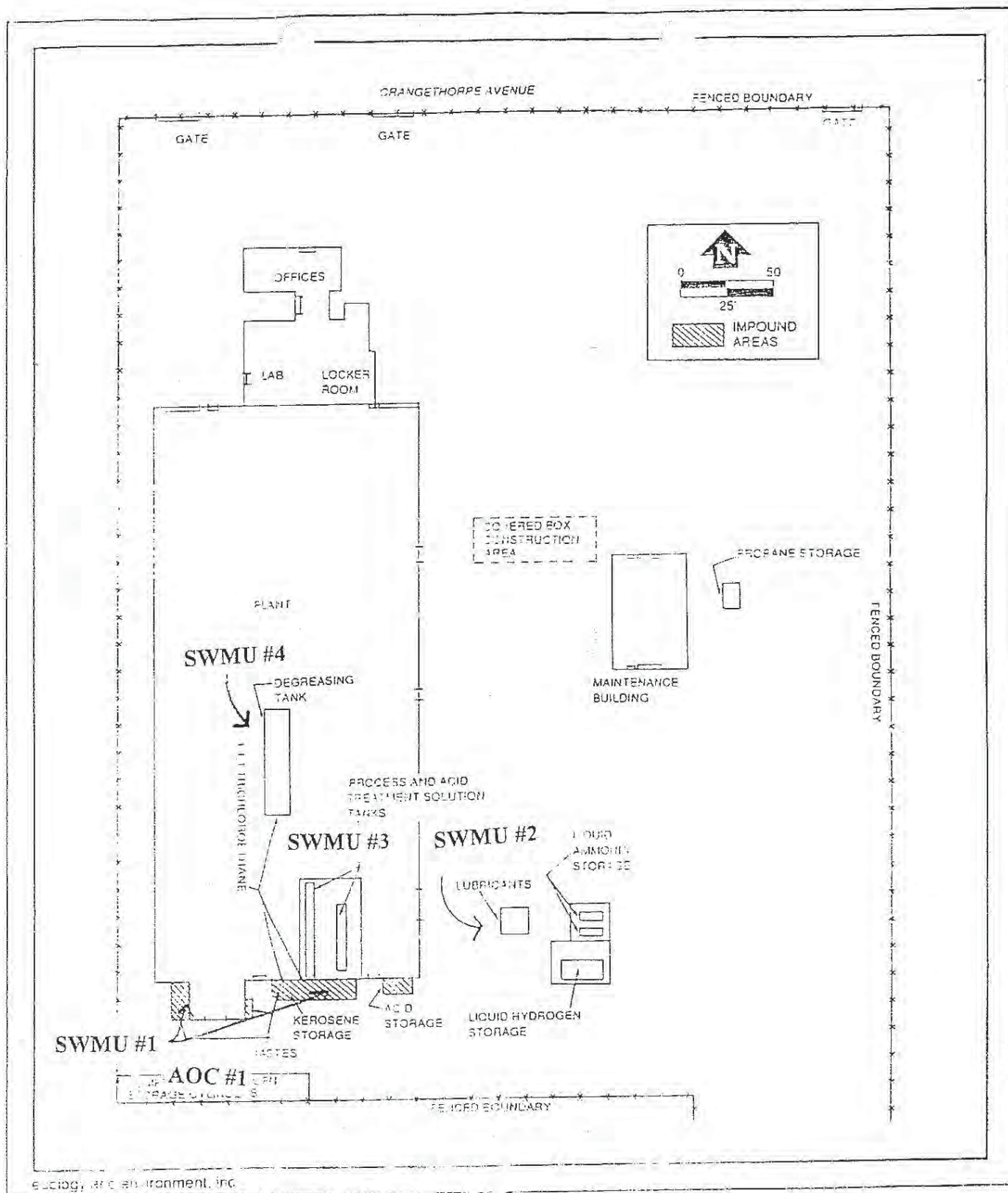
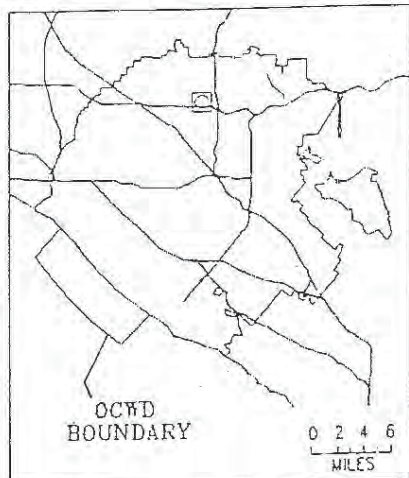
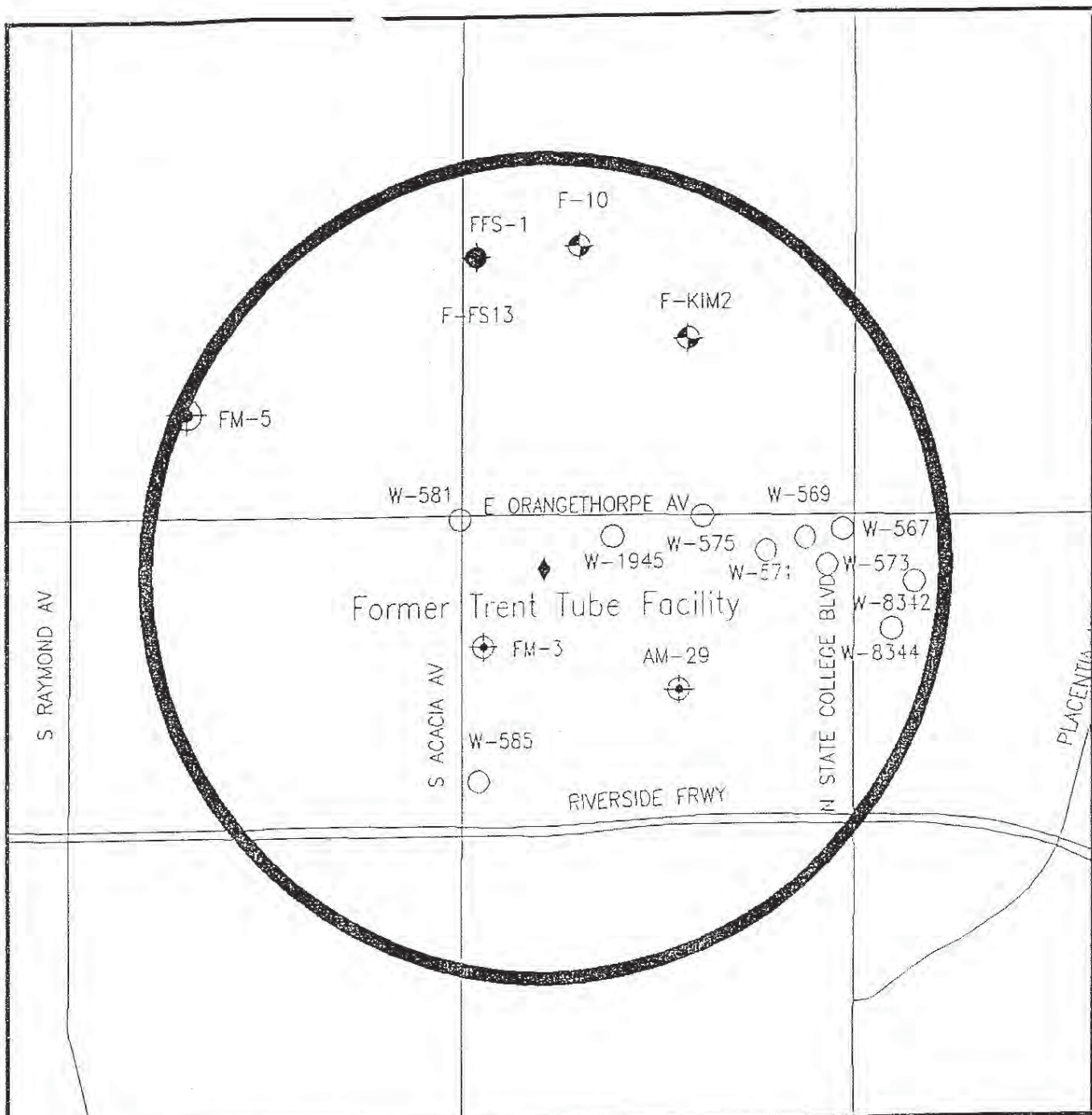


Figure 2

FACILITY MAP
TRENT TUBE FULLERTON
2100 East Orangethorpe Avenue
Fullerton, California



EXPLANATION

- PRODUCTION WELL
- SINGLE-POINT MONITORING WELL
- MULTI-POINT MONITORING WELL



INFORMATION REQUEST

Request ID: 3518
 Request Date: 06/24/1999
 Request Purpose: DEPT OF TOXIC SUBSTANCES CNTRL
 Client:
 Site Name:
 Site Address: 2100 E ORANGETHORPE AVE
 Site City: FULLERTON



figure 3

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

ATTACHMENT #1

to: file
from: Andrew Berna-Hicks
subject: Site Visit, Trent Tube Division, Fullerton, California

On February 11, 1999 I visited the former site of the Trent Tube Division facility. The building is currently used to store motor homes and boats and is known as the Executive RV Center. The building is the same one occupied by Trent Tube. The building has a concrete floor which appears to be in good condition with no obvious cracking. Whether this is the original floor was undetermined. Also, the presence of many motor homes made inspection of the floor problematic. The rear area was paved with asphalt and also used to store motor homes and boats. The front rooms of the building are occupied by an auto sales and leasing firm known as Autocar. These rooms were originally office space for Trent Tube and there is no record of hazardous material activity in these areas.

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

ATTACHMENT 2
PHOTOGRAPHS



Photo #1 - front of building, former office for Trent Tube

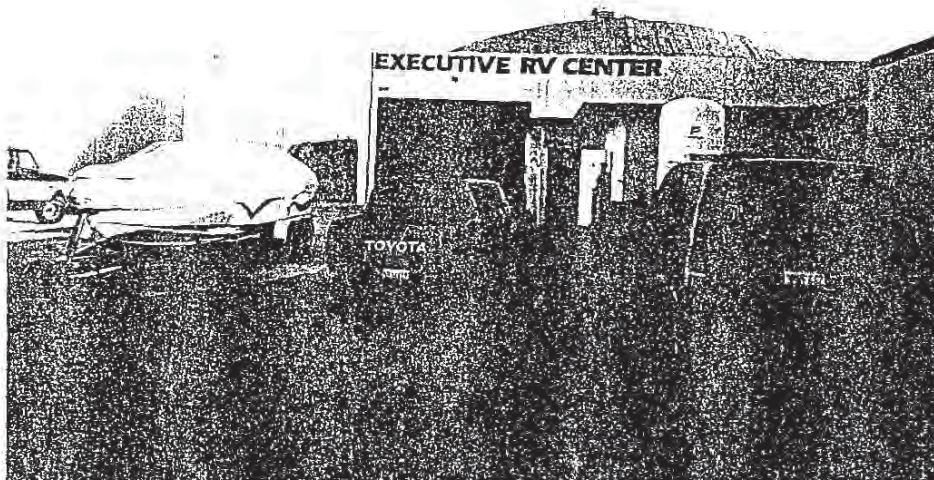


Photo #2 - east side of office, entrance to main building

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

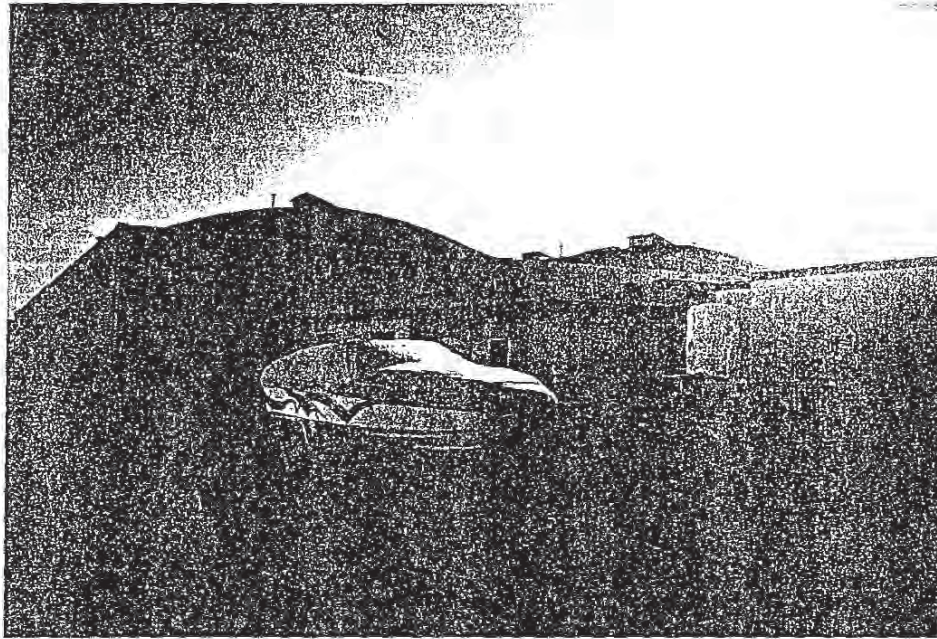


Photo #3 - east side of building



Photo #4 - rear of building

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

ATTACHMENT 3

ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT
TRENT TUBE DIVISION

prepared by

ECOLOGY AND ENVIRONMENT

September 15, 1991

ENVIRONMENTAL PRIORITIES INITIATIVE
PRELIMINARY ASSESSMENT

Purpose: RCRA Preliminary Assessment

Site: Trent Tube Division, Fullerton Operation
2100 East Orangethorpe Avenue
Fullerton, California 92634
Orange County

Site EPA ID Number: CAD008325110

TDD Number: F9-9105-067

Program Account Number: FCA1806RAA

FIT Investigators: Abby Goldenberg

Date of Drive-By: July 9, 1991

Report Prepared By: Abby Goldenberg

Report Date: September 15, 1991

Through: Lorene Flaming

FIT Review/Concurrence:

Submitted To: *James M. James 9/11/91*
Rachel Loftin
Site Assessment Manager
EPA Region IX



ecology and environment, inc.

160 SPEAR STREET SAN FRANCISCO CALIFORNIA 94105 TEL 415/777 2811

International Specialists in the Environment

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1. INTRODUCTION

As part of its Environmental Priorities Initiative (EPI) program, the U.S. Environmental Protection Agency (EPA) has requested Ecology and Environment, Inc.'s Field Investigation Team (E & E FIT) to conduct a Preliminary Assessment (PA) of Trent Tube Division Fullerton, located at 2100 East Orangethorpe Avenue, Fullerton, California.

The EPI program integrates the Resource Conservation and Recovery Act of 1976 (RCRA), as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA), with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), in order to set priorities for cleanup of the most environmentally significant sites first. The Preliminary Assessment is conducted using CERCLA Hazard Ranking System (HRS) criteria to determine the site's eligibility for inclusion on the National Priorities List and, thus, assists in prioritizing facilities for the RCRA program.

2. SITE DESCRIPTION

2.1 SITE LOCATION AND OWNER/OPERATOR HISTORY

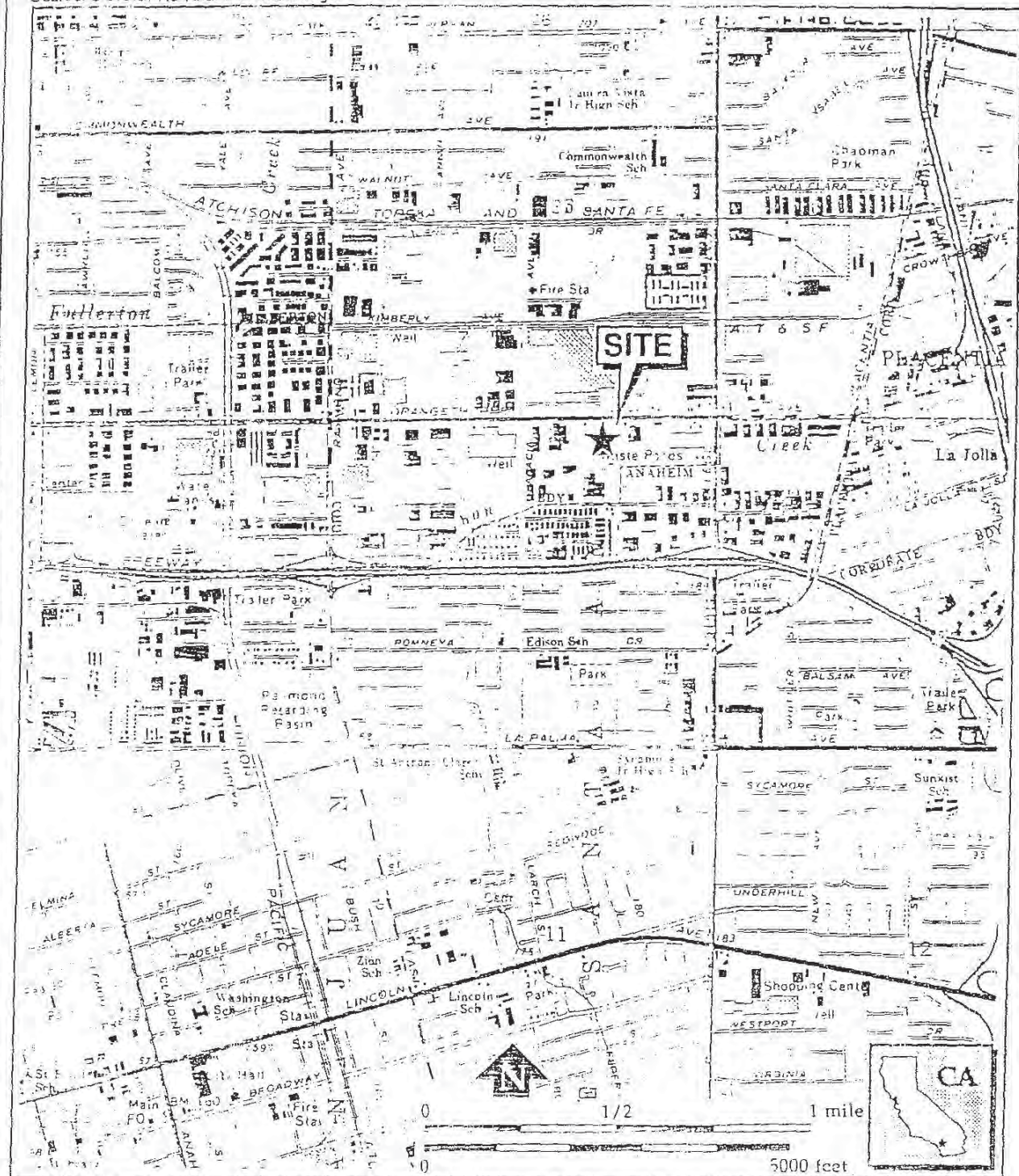
The Trent Tube Division Fullerton Operation (Trent Tube) site is located at 2100 East Orangethorpe Avenue, Fullerton, California (T. 4 S., R. 10 W., sec. 2, San Bernardino Baseline and Meridian; lat. 33°51'30" N., long. 117°53'03" W.) (see Figure 1, Site Location Map) (1,25). The 5.2-acre Trent Tube site is located in a mixed light industrial and commercial area in Orange County (35). The site is adjacent to Vista Paint Company (EPA ID# CAT080033277) (3,16).

The facility was constructed in the late 1950s by the Trent Tube Company (36). Trent Tube manufactured stainless steel tubing and customized prefabricated tubing to customer specifications (2). On May 11, 1984 all manufacturing on the site ceased (3). In 1985, Colt Industries sold the site to Howard K. Barlow (36). The site is currently leased to several companies including Auto Car Leasing and Executive RV Center (see Figure 2, Facility Map) (4,25,37).

2.2 FACILITY PROCESSES/WASTE MANAGEMENT

The following hazardous wastes were generated from operations at the facility until 1984: waste oil, spent solvents, and waste pickle liquor. The waste oil was stored in a 200-gallon steel tank. The spent solvents were stored in 55-gallon drums in two hazardous waste storage areas. The waste pickle liquor was stored in two 2,000-gallon indoor tanks. All waste was reportedly sent to a Class I landfill (7). Additional historical information about facility processes at the Trent Tube site was not available to FIT.

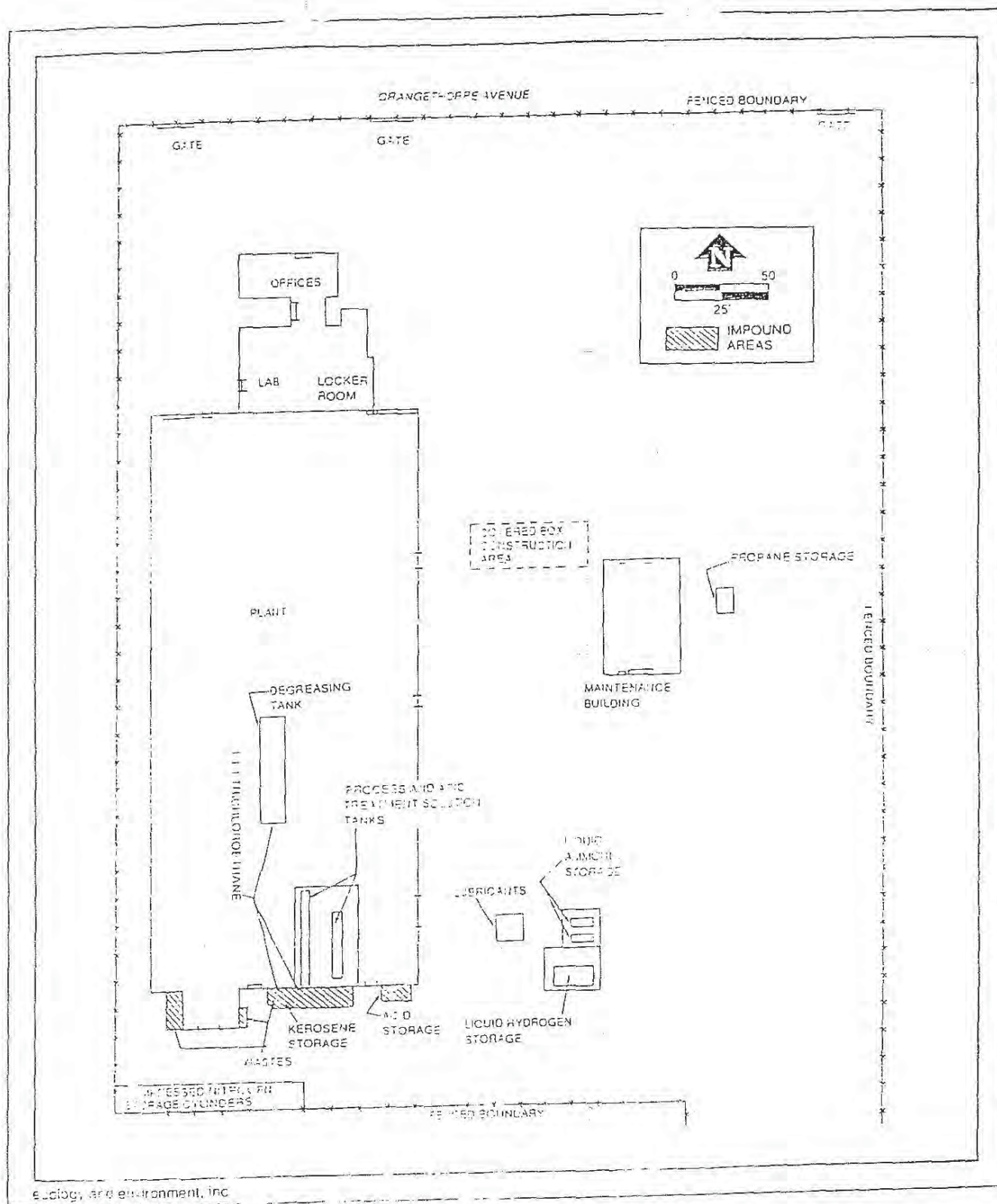
Source: U.S.G.S. 7.5' Anaheim Quadrangle



ecology and environment, inc.

Figure 1

SITE LOCATION MAP
 TIRENT TUBE FULLERTON
 2100 East Orangethorpe Avenue
 Fullerton, California



Ecology and Environment, Inc.

Figure 2
FACILITY MAP
TRENT TUBE FULLERTON
2100 East Orangethorpe Avenue
Fullerton, California

The Trent Tube site is currently leased to several companies including Auto Car Leasing and Executive RV Center by LaBarron Investments (4). Currently, the only wastes known to be generated on the site are approximately 200 gallons of waste oil each year from Executive RV Center (37). Auto Car Leasing and Executive RV Center are not listed in the Resource Conservation and Recovery Act (RCRA) Data Base dated April 22, 1991 (16).

3. REGULATORY INVOLVEMENT

3.1 U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)

A Notification of Hazardous Waste Activity was filed for the Trent Tube site in August 1980 (16). An RCRA Part A hazardous waste facility permit application was submitted to EPA in November 1980 for treatment and storage of hazardous waste (2). EPA rescinded the Part A for Trent Tube in August 1987 because the site had been clean-closed (6).

3.2 CALIFORNIA DEPARTMENT OF HEALTH SERVICES (DHS)

On April 6, 1981, an Interim Status Document (ISD) was issued by DHS for the Trent Tube site. The ISD authorized the treatment and storage of hazardous wastes on plant premises and required the preparation of an Operations Plan, a Contingency Plan, and a Closure Plan (3,8). On August 26, 1983 an Operations Plan for hazardous waste at the Trent Tube site was submitted to DHS which included a Closure Plan dated February 22, 1983 (3,7).

In December 1984, DHS required Trent Tube to prepare a Site Assessment Plan (SAP) to address inadequate closure of the facility (9). The SAP, submitted on December 18, 1984, outlined plans for obtaining borings and analysis of soil samples (10). The sampling results indicated the presence of organic contamination near the Trent Tube building and at higher levels near the back fence. A Site Remediation Plan was submitted to DHS on January 18, 1985 (3,35). In February 1985, 20 truckloads of contaminated soil were excavated and sent to the Casmalia Resource Management landfill in Casmalia, California. Sixteen truckloads of clean fill were backfilled into the hole and compacted (3). Closure certification was submitted to DHS on March 11, 1985 and approved by DHS on April 16, 1985 (5). DHS conducted a post-closure inspection of Trent Tube in September 1986 (11).

The Trent Tube site is not listed in the California Expenditure Plan for the Hazardous Substance Cleanup Bond Act of 1984 (revised 1989).

3.3 CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD (RWQCB)

RWQCB reviewed the Closure Plan for Trent Tube and recommended that soil contaminated with oil at the south side of the plant be removed to a depth of 3 feet during closure (3). These areas were removed and filled with clean crushed stone (10). There is no other known RWQCB involvement at the Trent Tube site (13).

3.4 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD)

Trent Tube submitted an application for an Excavation Permit to SCAQMD to conduct remedial work, which was issued on February 8, 1985 (3). Trent Tube possessed operating permits from SCAQMD for a degreaser, a scrubber, two storage tanks, and a flowcoater (7,14).

3.5 OTHER AGENCY INVOLVEMENT

The Orange County Health Care Agency inspected the Trent Tube site on April 15, 1985. The inspection report indicated that the site was not in operation (15). There are no other known agencies involved at the Trent Tube site.

4. DESCRIPTIONS OF INDIVIDUAL SOLID WASTE MANAGEMENT UNITS

Distinct Solid Waste Management Units (SWMUs) have been identified to evaluate potential on-site sources of releases to air, surface water, groundwater, and soil. A SWMU is defined as any discernible waste management unit at a facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste. As a result of this Preliminary Assessment, FII has identified three significant SWMUs at the site. It appears that one of these units is RCRA-regulated. Additional SWMUs may exist.

4.1 DRUM STORAGE AREAS

Unit Description: Two outdoor drum storage areas were formerly located at the southern portion of the Trent Tube facility. A maximum of 20 drums were stored in the storage areas at one time (7).

Date of Start-up: The date of start-up is unknown. The facility began operation in the late 1950s (36).

Date of Closure: The facility ceased operation on May 11, 1984 (3). The site was certified clean-closed in April 1985 (5).

Waste Managed: Waste solvents including 1,1,1-trichloroethane (TCA), kerosene, and mineral spirits were stored in 55-gallon drums in the storage areas. Approximately 800 to 1,300 gallons of spent TCA and 300 to 400 gallons of other spent solvents were generated each year (7).

Release Controls: Drums were stored in cement and concrete bermed impoundments (7).

History of Releases: The Site Assessment sampling results indicated the presence of organic contamination including TCA, tetrachloroethylene (PCE), and trichloroethylene (TCE) in two areas at the Trent Tube site (3). The sample locations appear to be near the location of the drum storage areas.

4.2 WASTE OIL STORAGE TANK

Unit Description: A 200-gallon steel tank was used to store waste oil at the Trent Tube site (7). The waste oil storage tank is located outside the building in the southwest portion of the site (2).

Date of Start-up: The date of start-up is unknown. The facility began operation in the late 1950s (36).

Date of Closure: The facility ceased operation on May 11, 1984 (3). The site was certified clean-closed in April 1985 (5).

Waste Managed: Waste lubricant oil was stored in the waste oil storage tank. Approximately 300 gallons of waste oil were generated each year. The oil was picked up every one to three months by a vacuum truck and taken to a Class I landfill (7).

Release Controls: The unlined steel tank was located in a concrete impoundment (7).

History of Releases: There were two areas of soil contaminated with oil at the Trent Tube site (12). These areas of contamination appear to be located near the waste oil tank.

4.3 SPENT PICKLE LIQUOR TANKS

Unit Description: Two 2,000-gallon tanks were located inside the southeast portion of the Trent Tube building. Spent pickle liquor was neutralized inside the tanks. Every three to five months the neutralized liquid was picked up and disposed of in liquid form in a Class I landfill (2,7).

Date of Start-up: The date of start-up is unknown.

Date of Closure: The facility ceased operation on May 11, 1984 (3). The facility was certified clean-closed in April 1985 (5).

Waste Managed: Mixed nitric and hydrofluoric acid was used for descaling and cleaning stainless steel tubing (2). The spent acid mixture was neutralized with ammonia inside the tanks prior to disposal. The mixture is a RCRA listed waste (K062) and contains lead and chromium (VI). Approximately 7,000 to 10,000 gallons per year were generated (7). - (x6)

Release Controls: The tanks were located inside the Trent Tube building (7).

History of Releases: There is no known history of releases. No information was available to FIT on sampling for metals.

4.4 AREA OF CONCERN

A degreasing pit which measured 13 feet wide by 16 feet long by 7 feet deep was located inside the Trent Tube building. It was present in 1983; however, no other information about the pit was available to FIT. No sampling information was available to FIT.

5. HRS FACTORS

The Hazard Ranking System (HRS) is a scoring system used to assess the relative threat associated with actual or potential releases of hazardous substances from sites. It is the principal mechanism EPA uses to place sites on the National Priorities List (NPL). FIT has evaluated the following HRS factors relative to this site.

5.1 WASTE TYPE AND QUANTITY

The known waste streams generated annually at the Trent Tube include: approximately 1,200 gallons of spent solvents, 300 gallons of waste oil, and 7,000 to 10,000 gallons of spent pickle liquor containing lead and chromium VI (see Section 4 for details) (7). Soil sampling to a depth of 10.5 feet below ground surface detected TCA, PCE, TCE. TCA was detected at 780 ppm. Twenty truckloads of contaminated soil were excavated in 1985 and transported to a treatment, storage or disposal facility (ISDF) (3).

5.2 GROUNDWATER

The Trent Tube site is located in the coastal plain and is underlain by three major aquifer systems, the lower, middle and upper aquifers. The upper aquifer system consists of sediments of upper Pleistocene and younger alluvium to a thickness of 800 feet and is formed by sediments of the La Habra Formation, stream terrace deposits, older alluvium, and recent alluvium. The middle aquifer system is comprised of lower Pleistocene sediments from the San Pedro and Coyote Hills formations. The middle aquifer system is the major groundwater supply for the Orange County basin and contains multiple layers of gravelly sediments. The lower aquifer is comprised of Pleistocene and older sediments, bearing fresh water to a depth of almost 4,000 feet. Interconnection of the upper and middle water-bearing strata is through recent alluvium, limited by the Norwalk fault zone (17).

Soils in the region consist of alluvial sand and silty sand (18). Groundwater beneath the site is found at approximately 80 feet below ground surface (bgs) (3). Groundwater flow is to the southwest (17,20). Annual net precipitation in the Fullerton area is 5.19 inches (19).

Water for the region is supplied by five water purveyors. These include the Yorba Linda Water District, City of Anaheim, City of Fullerton, City of Orange, and Southern California Water Company (20,21,24,27,28).

The Yorba Linda Water District serves approximately 60,000 people. They have seven active wells in a blended system. The wells provide 45 percent of the drinking water supply. The remaining 55 percent of their water supply is imported from the Metropolitan Water District (MWD) (20).

The City of Anaheim uses approximately 70 percent groundwater in its drinking water system. There are 35 wells in the system. The well system supplies approximately 207,000 people with water (21,22,23).

The City of Fullerton gets 65 percent of its drinking water from municipal wells and 35 percent from MWD. Water from these two sources is not blended. Water purchased from the district serves the northern part of the city and the wells serve the southern part. The population of Fullerton is 112,000. The 11-well system is interconnected and serves approximately 72,800 people (24,26).

The City of Orange has a system of 15 wells which are blended with imported water to serve a population of 107,000. No single source provides more than 40 percent of the system's supply. Seventy percent of the water comes from wells and thirty percent is imported (27).

Three of Southern California Water Company's six wells are located in the Placentia area. Approximately 20,000 people in the southern part of Placentia are served by groundwater. The northern part is served mainly by MWD water (28).

A release of contaminants to the groundwater has been not documented at the Trent Tube site. A potential exists for a release to groundwater due to the depth to groundwater and the presence of soil contamination. Twenty truckloads of soil were removed, however it is not known if post-removal confirmation samples were taken (17).

5.3 SURFACE WATER

The only surface water body located within 2 miles of the Trent Tube site is Carbon Creek. There are no beneficial uses of Carbon Creek except flood control (29,30). Carbon Creek flows into the San Gabriel River which is also not used for drinking or fishing (1,29,30).

The Trent Tube site is located in a Zone B floodplain. Zone B is defined as areas between the 100-year and 500 year floodplain (7). The 2-year, 24-hour rainfall for the Fullerton area is 2.5 inches (32).

5.4 AIR

A release of contaminants to the air has not been documented from the Trent Tube site. The potential to release is low because the site is paved and the facility is no longer in operation (3,25). Wastes and contaminated soil were removed after the facility ceased operation in 1984 (3). The only known waste generated by current operators is waste oil (37).

The estimated population distribution within 4 miles of the Trent Tube site is shown in Table 1 (34). No known federal or state protected species are known to exist within 4 miles of the Trent Tube site (33).

Table 1

<u>Distance (miles)</u>	<u>Population</u>
On-site	0
Greater than 0 to 0.25	0
Greater than 0.25 to 0.5	3,428
Greater than 0.5 to 1	11,763
Greater than 1 to 2	58,413
Greater than 2 to 3	76,003
Greater than 3 to 4	96,236

5.5 SOIL EXPOSURE

There is a low potential for exposure via the soil exposure pathway because the site is paved and the Trent Tube facility is no longer in operation (3,25). Wastes and contaminated soil were removed after the facility ceased operation in 1984 (3). The population located within 1 mile of the Trent Tube site is approximately 15,191 (34). While the site was operated by Trent Tube, the site was surrounded by a 6 foot chain-link fence, locked gates and an alarm system (7).

6. SUMMARY OF FIT INVESTIGATIVE ACTIVITIES

6.1 AGENCIES CONTACTED

As part of the investigation of the Trent Tube site, FIT contacted the following agencies: California Department of Health Services, California Regional Water Quality Control Board, South Coast Air Quality Management District, Orange County Environmental Management Agency, and Orange County Health Care Agency (13,14,30). Information from these sources is presented throughout this report.

6.2 RECONNAISSANCE OBSERVATIONS

In concurrence with EPA, a drive-by was conducted of the Trent Tube site on July 9, 1991. FIT observed that two companies, Auto Car Leasing and Executive RV Center, were located at the site. (See Drive-By report for details) (25).

7. EMERGENCY RESPONSE CONSIDERATIONS

The National Contingency Plan [40 CFR 300.415(b)(2)] authorizes the Environmental Protection Agency to consider emergency response actions at those sites which pose an imminent threat to human health or the environment.

The site was certified clean-closed by DHS on April 16, 1985. There is no apparent need for a referral of this site to EPA's Emergency Response Section at this time because all known wastes have been removed from the site (5).

8. SUMMARY OF HRS CONSIDERATIONS

The Trent Tube Division Fullerton Operation site is located at 2100 East Orangethorpe Avenue in Fullerton, California. Trent Tube manufactured stainless steel tubing and customized prefabricated tubing. Operations ceased at the site on May 11, 1984. Closure certification was approved by the California Department of Health Services on April 16, 1985. The site is listed in the Resource Conservation and Recovery Act database as closure certified. The site is currently owned by LaBarron Investments and leased to several companies including Auto Car Leasing and Executive RV Center. The only waste known to be on site currently is waste oil.

The following are significant Hazard Ranking System factors associated with the Trent Tube site:

- o Moderate waste quantity;
- o The site has been clean closed and wastes were removed to a TSDF;
- o A low potential exists for a release to surface water and air;
- o A potential exists for a release to groundwater;
- o Groundwater within 4 miles of the site is supplemented by surface water to serve approximately 300,000 people; and
- o Distance to the nearest well is 0.25 miles from the site.

9. EPA RECOMMENDATION

No Further Remedial Action Planned under CERCLA

Higher-Priority for Further Site Assessment

Lower-Priority for Further Site Assessment

Defer to Other Authority
(e.g., RCRA, TSCA, NRC)InitialDate

PL9.16.91

Notes:

10. REFERENCES

1. U S Geological Survey, map of Anaheim, California, 7.5-minute quadrangle 1965 (photorevised 1981).
2. Trent Tube Division, Fullerton Operation (Trent Tube), Hazardous Waste Part A Permit Application, November 10, 1980.
3. Calocerinos & Spina, "Facilities Closure Report for Trent Tube Division, Fullerton Plant", March 1985.
4. Lindsey, Nancy, U S Environmental Protection Agency (EPA), and Abby Goldenberg, Ecology and Environment Inc.'s Field Investigation Team (E & E FIT), telephone conversation, August 22, 1991.
5. Hinton, John, California Department of Health Services (DHS), to Robert M. Phillips, Trent Tube Division, letter, April 16, 1985.
6. Feeley, Michael, U.S. EPA, to Angelo Bellomo, DHS, letter, August 24, 1987.
7. Trent Tube Division, Fullerton Operation, Operation Plan for Hazardous Waste, March 12, 1980.
8. DHS, Interim Status Document, Trent Tube Division, Fullerton Operation, April 6, 1981.
9. Hinton, John, DHS, to Robert M. Phillips, Trent Tube, letter, December 3, 1984.
10. "Site Assessment Plan", Trent Tube Division, January 18, 1984. *Dec*
11. U S EPA, Resource Conservation and Recovery Act (RCRA), Quality Assurance Check List, Trent Tube Fullerton Division, June 9, 1987.
12. Anderson, James W., Regional Water Quality Control Board (RWQCB), to Angelo Bellomo, DHS, memorandum, May 4, 1984.
13. Rakiri, Cherry, RWQCB, and Abby Goldenberg, E & E FIT, telephone conversation, June 6, 1991.
14. Foss, Lea Yvonne, South Coast Air Quality Management District, and Abby Goldenberg, E & E FIT, letter, July 1, 1991.
15. Bish, Katherine, Orange County Health Care Agency, hazardous waste inspection of Trent Tube Division, April 15, 1985.
16. U.S. EPA, RCRA, April 10, 1991.
17. Brown and Caldwell, "Fullerton Water System Master Plan and Related Studies", March 1983.

REFERENCES (CONT.)

18. Moore & Taber, Foundation Investigation, 2100 East Orangethorpe Avenue, August 16, 1984.
19. U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA), National Environmental Satellite Data and Information Service, National Climatic Data Center, Comparative Climatic Data for the United States Through 1985, Nashville, TN.
20. Robinson, Mike, Yorba Linda Water District, to Janice Brickell, E & E FII, facimile, December 28, 1990.
21. Bustos, Carlos, City of Anaheim, and Chris Nelson, E & E FIT, telephone conversation, May 7, 1990.
22. City of Anaheim, Water Production Data Sheet, Fiscal Year 1989-1990.
23. reference deleted
24. Sears, Larry, City of Fullerton, and Chris Nelson E & E FII, telephone conversation, November 26, 1990.
25. Goldenberg, Abby, "Drive-By Report", Trent Tube Fullerton Division, July 9, 1991.
26. City of Fullerton, map of water system, no date
27. Jast, Richard, City of Orange, and Janice Brickell, E & E FII, telephone conversation, December 28, 1990.
28. Costeson, Frank, Southern California Water Company, and Helena Brykarz, E & E FIT, telephone conversation, March 5, 1990.
29. Moore, Jim, Los Angeles County Department of Public Works, and Peter Towle, E & E FIT, telephone conversation, July 8, 1990.
30. Bonn, Richard, Orange County Environmental Management Agency, and Abby Goldenberg, E & E FII, telephone conversation, June 12, 1991.
31. Diefendorf, Andrew, Calocerinos & Spina, to Roy Thieking, DHS, letter, January 18, 1985.
32. U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA), National Weather Service, NOAA Atlas II, Precipitation-Frequency Atlas of the Western United States, Volume XI-California, p. 61, Silver Spring, MD, 1973.
33. State of California Department of Fish and Game, "Natural Diversity Database (RareFind)," Anaheim, California quadrangle, April 1991.
34. U.S. EPA, Office of Toxic Substances, "Graphical Exposure Modeling System," March 1989.

REFERENCES (CONT.)

35. Malone, Walfer, and Kurt Shelger, Lander Associates, "Appraisal of Irent Stainless Tube Company", September 14, 1983.
36. Manewitz, Mark, Coltec Industries, to Abby Goldenberg, E & E FIT, letter, August 26, 1991.
37. McCall, Mike, Orange County Health Care Agency, "Hazardous Waste and Underground Storage Tank Inspection Report", Executive RV Center, February 15, 1991.

PA CONTACT LOG

Facility Name: Trent Tube Division Fullerton
Facility ID: CAD008325110

Name	Affiliation	Phone #	Date	Information
Frank Costeson	So. California Water Company	213-251-3600	3/5/90	See Contact Report.
Carlos Bustos	City of Anaheim	714-999-5100	5/7/90	See Contact Report.
Jim Moore	L.A. County Public Works	818-445-7630	7/8/90	See Contact Report
Larry Sears <i>Noted.</i>	City of Fullerton	714-738-6886	11/26/90	See Contact Report.
Richard Lass	City of Orange	714-532-0356	12/28/90	See Contact Report.
Mike Robinson	Yorba Linda Water District	714-777-3018	12/28/90	See Contact Report.
Cherly Rwakiri	RWQCB	714-782-4130	6/5/91	There are no active or inactive files at RWQCB for the Trent Tube site.
Richard Bonifant	Orange County Environmental Management Agency	714-561-6371	7/15/91	See Contact Report.
Abby Goldenberg	E & E FIT	415-777-2811	7/9/91	Site Drive-by.
Nancy Lindsay	EPA	415-744-2038	8/22/91	See Contact Report.

*Water 2 - Issues
- Air Pollution*

John -

CONTACT REPORT

AGENCY/AFFILIATION: EPA		
DEPARTMENT: RCRA Enforcement		
ADDRESS/CITY: San Francisco		
COUNTY/STATE/ZIP: San Francisco, CA		
CONTACT(S)	TITLE	PHONE
1. Nancy Lindsey		415-744-2038
2.		
E & E PERSON MAKING CONTACT: Abby Goldenberg		DATE: 8/22/91
SUBJECT: Site Description		
SITE NAME: Trent Tube		EPA ID#: CAD008325110

She spoke with Mr Fischer of La Barron Investments and obtained the following information.

- LaBarron Investments purchased the site in 1985.
- LaBarron Investments owns and leases the site.
- The site is leased to several companies including Auto Car Leasing and Executive RV Center

FIELD PHOTOGRAPHY LOG SHEET

DATE: 7/9/91

TIME: 10 AM

DIRECTION:

SOUTHWEST

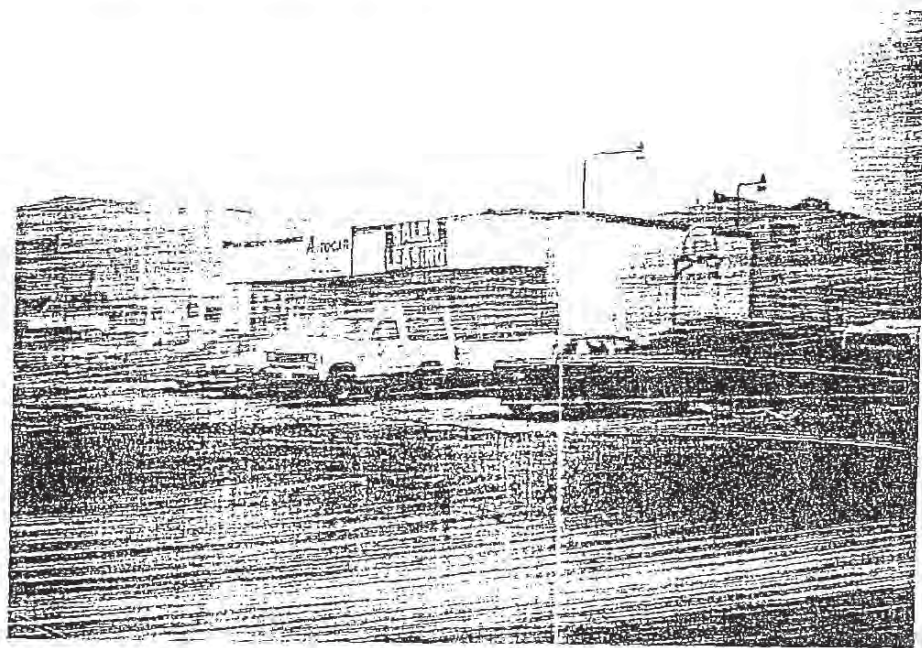
WEATHER:

OVERCAST

PHOTOGRAPHED BY:

Abby Goldenberg

DESCRIPTION:



Autocar facility at Irent Tube site.

Trent Tube Division, Fullerton, CA
RCRA Facility Assessment

ATTACHMENT 4

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (PART A)

prepared by

TRENT TUBE DIVISION

for the

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

November 10, 1980

easy print or type in the unshaded areas only
ill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 150-107-02

FORM 1		ENVIRONMENTAL PROTECTION AGENCY		EPA I.D. NUMBER	
GENERAL INFORMATION		Consolidated Permits Program (Read the General Instructions before starting.)		F C AD 008 32511 03D	
I. LABEL ITEMS		PLEASE PLACE LABEL IN THIS SPACE		GENERAL INSTRUCTIONS	
EPA I.D. NUMBER				If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items II, III, IV, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorization under which this data is collected.	
II. FACILITY NAME					
FACILITY MAILING ADDRESS					
FACILITY LOCATION		19 NOV 1980			

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column. If the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK "X" IN BOX		
	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X	
D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	
J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	TRENT TUBE DIV FULLERTON OPERATION
---	------	------------------------------------

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	SOLLITTO CHRISTOPHER PLT ENGR	714	526 5522

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	P.O. BOX 3068	4	FULLERTON	CA	92634

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	2100 e ORANGETHORPE AVENUE	6	ORANGE	7	FULLERTON	CA	92634 059

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

I. SIC CODES (4 digit in order of priority)

A. FIRST				B. SECOND			
3 3 1 2 (specify)				(specify)			
MFG. STAINLESS STEEL TUBING							
C. THIRD				D. FOURTH			
(specify)				(specify)			

II. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the owner?			
TRENT TUBE DIV OF CRUCIBLE INC												YES <input type="checkbox"/> NO <input type="checkbox"/>			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box. If "Other," specify)															
F. FEDERAL M. PUBLIC (other than federal or state) S. STATE O. OTHER (specify) P (specify)															
D. PHONE (area code & no.)															
A 7 1 4 5 2 6 5 5 2 2															
E. STREET OR P.O. BOX															
0 BOX 88															
F. CITY OR TOWN												G. STATE		H. ZIP CODE	
PITTSBURGH PA												PA		1 5 2 3 0	
IX. INDIAN LAND															
Is the facility located on Indian lands? YES <input type="checkbox"/> NO <input type="checkbox"/>															

EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)												D. PSD (Air Emissions from Proposed Sources)											
N X												9 P A O B L O 1 4 D J											
B. UIC (Underground Injection of Fluids)												E. OTHER (specify)											
U X												(specify)											
C. RCRA (Hazardous Wastes)												F. OTHER (specify)											
R X												(specify)											

11. MAP F9: 30
Attach a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage or disposal facilities and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS F9: 51

MANUFACTURE OF STAINLESS STEEL TUBING
REDRAW PREFABRICATED TUBING TO CUSTOMER SPECIFICATIONS

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
C SOLLITTO PLANT ENGINEER		<i>Christopher Sollitto</i>		11-10-80	

COMMENTS FOR OFFICIAL USE ONLY

C											
D											

Type in the unshaded areas only
are spaced for elite type, i.e., 12 characters/inch).

Form Approved UMB No. 100-300004



HAZARDOUS

ENVIRONMENTAL PROTECTION AGENCY
SWASTE PERMIT APPLICATION
Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

1. EPA I.D. NUMBER

F C A D 0 0 8 3 2 5 1 1 0 1

OFFICIAL USE ONLY

DATE RECEIVED (yr., mo., & day)

15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY
87	06	15

FOR NEW FACILITIES PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION (place an "X" below and complete item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS		T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	SURFACE IMPOUNDMENT		
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
Disposal:				T04	GALLONS PER DAY OR LITERS PER DAY
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided, Item III-C.)		
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

5	C										DUP										1										
1	2	13 14 15										13 14 15										13 14 15									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY						
		1. AMOUNT (specify)										UNIT OF MEASURE (enter code)			1. AMOUNT										2. UNIT OF MEASURE (enter code)						
X-1	S 0 2	600										G	5																		
X-2	T 0 3	20										E	6																		
1	T 0 1	1600, 4 TIMES PER YR.										G	7																		
2	S 0 1	660, 4 TIMES PER YEAR										G	8																		
3													9																		
4													10																		
16 17 18 19		27										28	16 17 18 19		27										28						

PROCESSES (continued)

PLACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04").
INCLUDE DESIGN CAPACITY

EACH PROCESS ENTERED

As per my conversation on 19 February 1981 with Mr. William D. Wilson who requested a change in the unit of measure on Line 1, part C, Section III from "G" to "U" for the sole purpose of having the E.P.A. computer accept the information.

The process is 1600 gallons of pickle liquor is neutralized 4 times per year and subsequently disposed in accordance with all state and federal regulations.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE - For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE **CODE**
POUNDS P
TONS T

METRIC UNIT OF MEASURE **CODE**
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

FOR OFFICIAL USE ONLY

9											T/A C		
W	DUP											2	DUP
1	2									13	14	15	22

[illegible]

IV. DESCRIPTION OF HAZARDOUS WASTE

(continued)

E USE THIS SPACE TO LIST ADDITIONAL

PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	C	A	D	0	0	8	3	2	5	1	1	0	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

3	3	5	1	3	0
55	56	57	58	59	60

1	1	7	5	3	3	6
72	73	74	75	76	77	78

VIII. FACILITY OWNER

☐ A If the facility owner is also the facility operator as listed in Section VIII on Form 1 "General Information", place an 'X' in the box to the left and skip to Section IX below

B If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

S	E
13	14

 CRUCIBLE, INC.

4	1	2	-	9	2	3	-	2	9	5	5
50	51	52	53	54	55	56	57	58	59	60	61

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F
13	14

 P.O. BOX 88

C	G
13	14

 PITTSBURGH

P	A
40	41

1	5	2	3	0
47	48	49	50	51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A NAME (print or type)

B SIGNATURE

C DATE SIGNED

J.P. Foley, Division President

Nov. 17, 1980

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A NAME (print or type)

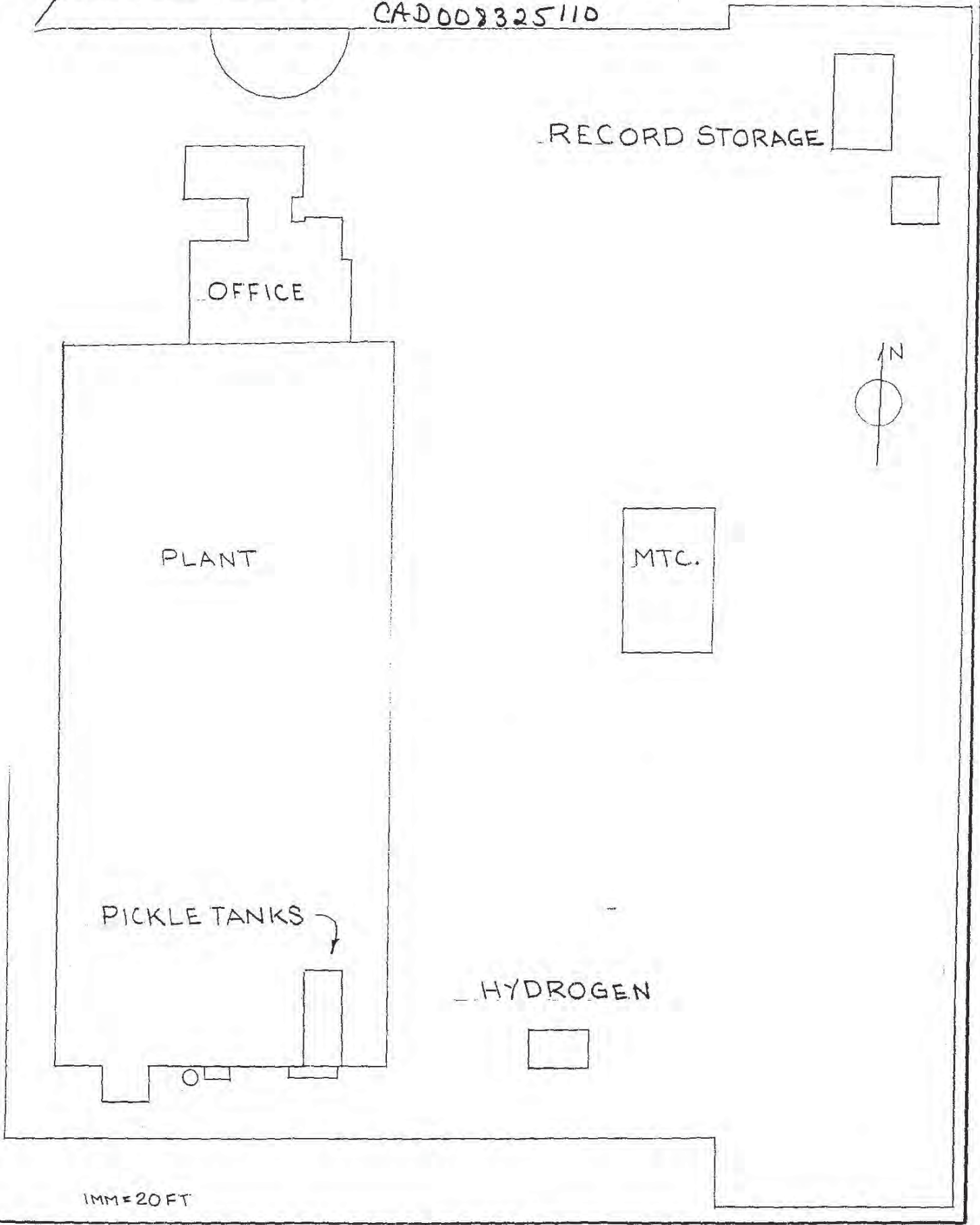
B SIGNATURE

C DATE SIGNED

C. SOLLITTO PLANT ENGINEER

11-10-80

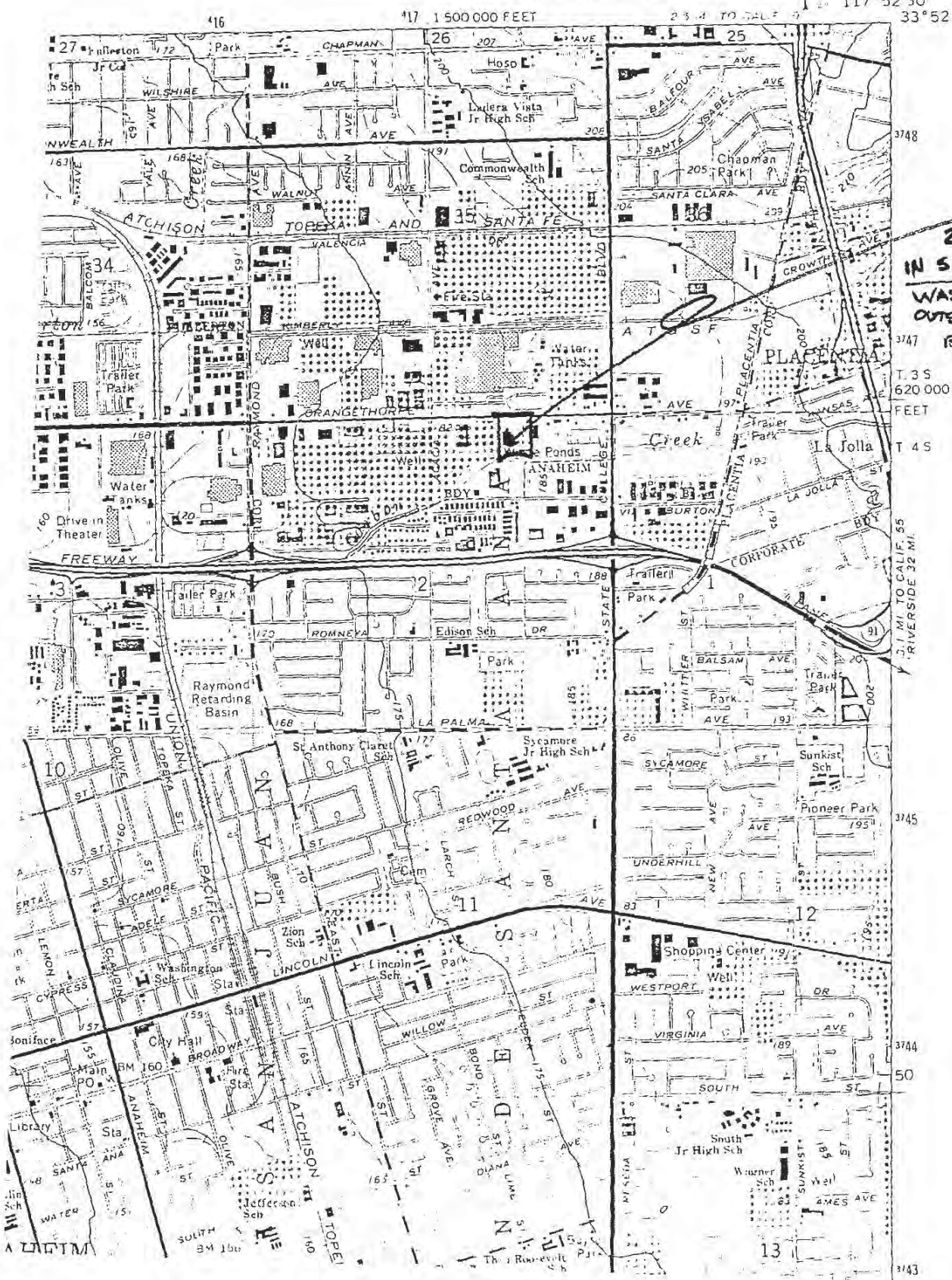
CAD008325110



1MM=20FT

2-21-74
(YORBA LINDA)

117° 52' 30"
33° 52' 30"



2 PICKLE TANK
IN SE CORNER OF BLDG
WASTE OIL CONT
OUTSIDE SW CORNER
3747 BLDG

OCTOBER 20, 1981

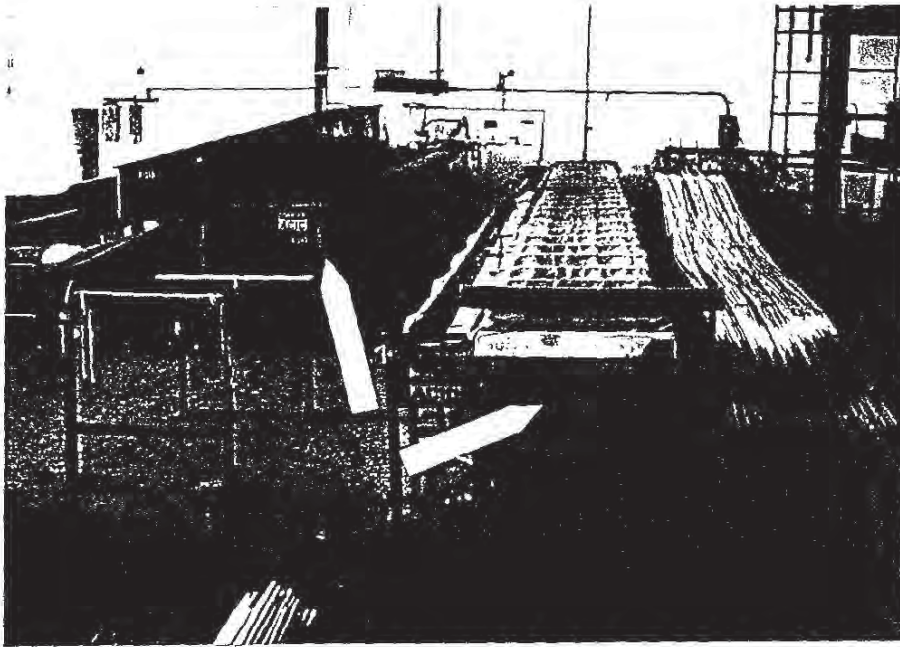


Figure 5 - In-door process tanks containing mixed nitric plus hydrofluoric acid solutions. Spent acid is neutralized within the process tanks. The neutralized spent acid is then pumped into a tank truck for disposal at BKK landfill in West Covina, California. (Located in SE sector of plant.)

OCTOBER 20, 1987



Figure 3 - Waste degreaser still sludge storage in 55 gallon drums at southern edge of property. Upright drums contain waste. Stacked drums are empty. This material is sold for reclamation. Tank in upper right is on adjacent property and does not belong to Trent Tube.

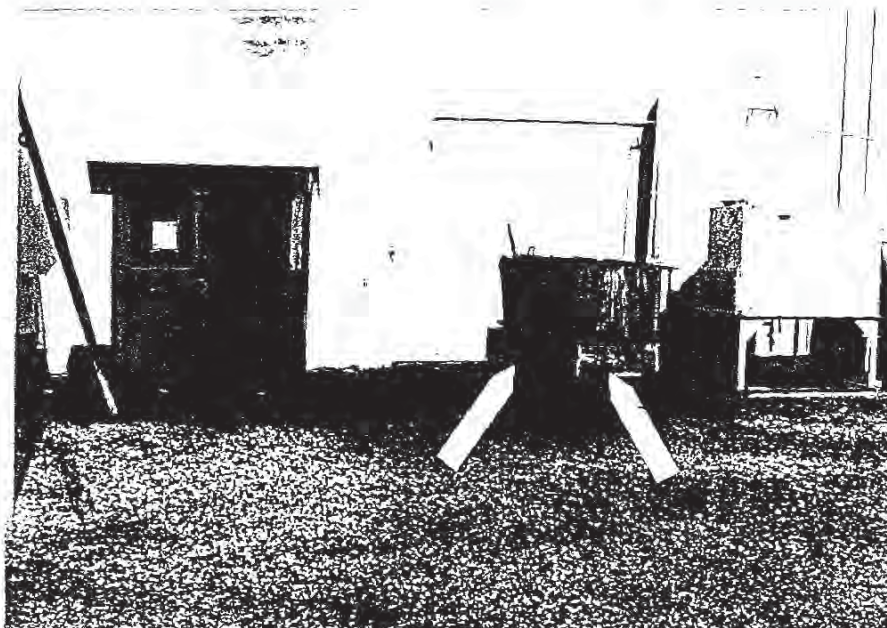


Figure 4 - Two waste detergent tanks located at rear of plant. Each tank has a 200 gallon capacity. When full waste is pumped into a tank truck for disposal at BKK.

OCTOBER 20, 1981

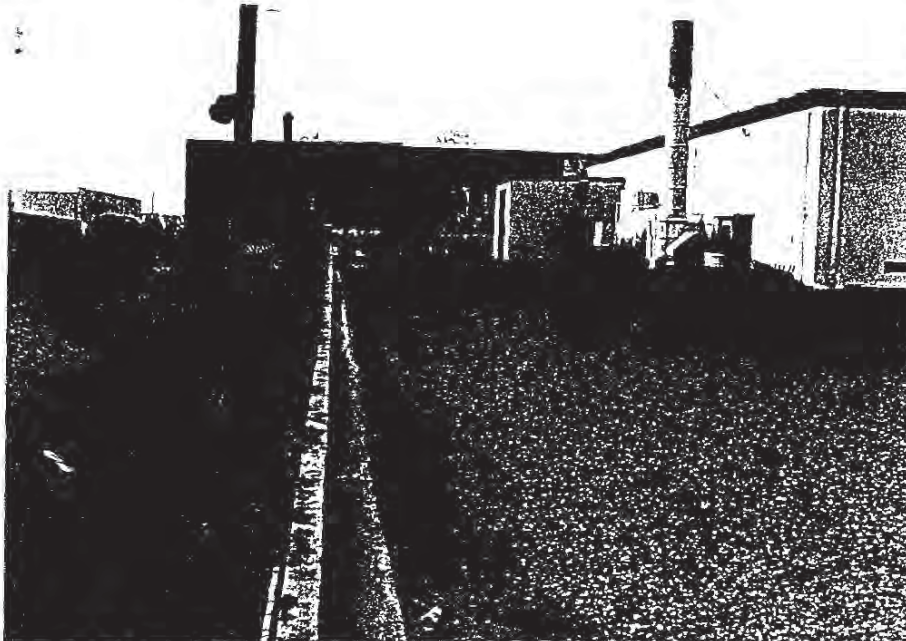


Figure 1 - Overall view of back (south end) of building showing drum storage adjacent to curbing. Photo taken from south east corner looking west. Grey building in background and area to left of chainlink fence is adjoining property not belonging to Trent Tube.

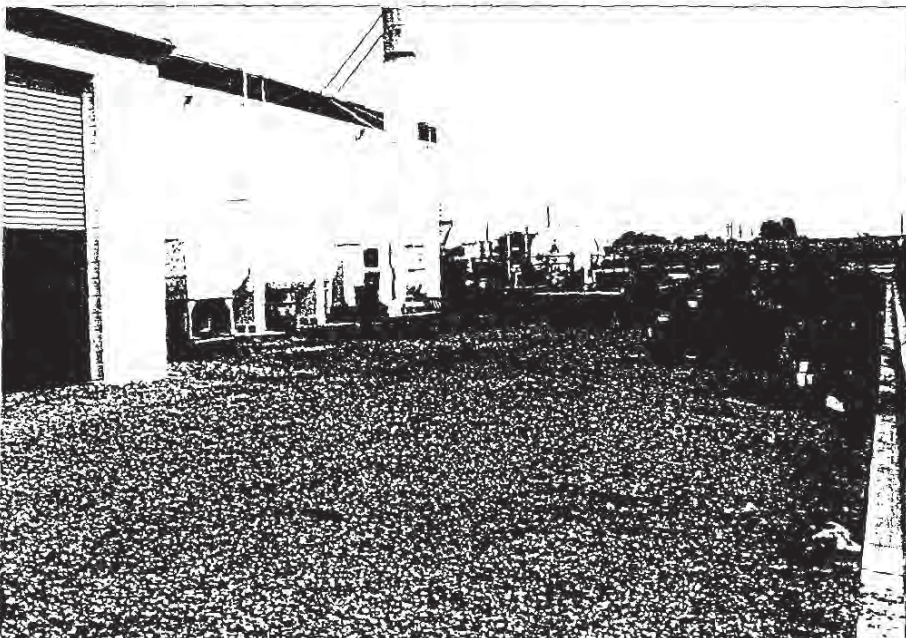


Figure 2 - Rear of plant (south end) also showing drum storage adjacent to curbing. Taken from south west corner of property looking east.

TOXIC SUBSTANCES CONTROL DIVISION

RECORD OF PUBLIC REVIEW

Requester: RANDY WORTHINGTON DATA REPRODUCTION	Representing: (GIBSON, DUNN + DAVIS GOODMAN CRUTCHER)	Date: 2-10-87
---	--	------------------

I have read the Department's guidelines and wish to inspect the following public record.

Complete Description of Record: TRENT TUBE FILE

To be completed by Departmental Office:

Approved _____ Inspected by _____ Date _____

Disclosure of the requested record is prohibited by law:

Department Representative: J. Capó	Section/Unit: File Room	Date: 2-10
---------------------------------------	----------------------------	---------------

EPA ID NO. CAD 00825110

FILE NAME Trent Tube Division of
Cummins Inc.

ACTIVITY RECORD

[illegible]

FILE CHECKLIST

PERMIT FILE

<u>DOCUMENT DESCRIPTION</u>	<u>DATE</u>	<u>INITIALS</u>	<u>LOCATION</u>
Activity Record			
Record of Public Review			
Permit - signed			
Revocation Notice			
Modification Notice			
Denial Notice			
Variance/Exemption			
Permit Package (mailed to Sacto)			
Statement of Facts			
Facility Inventory Form			
CEQA Notice (Exemption, Negative Declaration, EIR)			
Site Inspection Forms			
Public Hearing Documents (transcript/sign-in sheet/agenda/comment cards)			
Public Notices for Newspaper & Radio			
Draft Permit			
Financial Assurance Forms			
Notice of Operation Plan Deficiencies			
Operation Plan Review Checklist			
Operation Plan Request (Part B)			
Interim Permit			
Interim Modification			
Interim Revocation			
Part A Application			
Part A Checklist			
Cassette Tapes			

TOXIC SUBSTANCES CONTROL DIVISION

RECORD OF PUBLIC REVIEW

Requester:	Representing:	Date:
<p>I have read the Department's guidelines and wish to inspect the following public record.</p>		
<p><u>Complete Description of Record:</u></p>		
<p>To be completed by Departmental Office:</p>		
<p>Approved _____ Inspected by _____ Date _____</p>		
<p>Disclosure of the requested record is prohibited by law:</p>		
Department Representative:	Section/Unit:	Date: